

Arbitration - DJ Trump for President v. Omarosa Manigault-Newman
February 21, 2020

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Exhibit C

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1	AMERICAN ARBITRATION ASSOCIATION NEW YORK, NEW YORK	1	I N D E X
2		2	Witness
3	DONALD J. TRUMP FOR PRESIDENT, INC., a Virginia not-for-profit corporation,	3	LUCIA CASTELLANO
4		4	Direct Examination by Mr. Phillips
5	Claimant,	5	
6	vs.	6	
7	OMAROSA MANIGAULT NEWMAN, an individual,	7	- - -
8		8	
9	Respondent.	9	(No Exhibits)
10		10	
11	Videotaped Deposition of LUCIA CASTELLANO	11	- - -
12		12	
13	Taken on behalf of Respondent	13	
14		14	
15	DATE TAKEN: Thursday, March 4, 2021	15	
16	TIME: 10:03 a.m. - 12:13 p.m.	16	
17	PLACE: By videoconference	17	
18	Examination of the witness taken before: Julia Jarrett Green, RPR, FPR	18	
19		19	
20		20	
21		21	
22	RILEY REPORTING & ASSOCIATES, INC. 1300 Riverplace Boulevard, Suite 610 Jacksonville, Florida 32207 info@rileyreporting.com (904)358-1615	22	
23		23	
24		24	
25		25	
Page 2		Page 4	
1	A P P E A R A N C E S	1	COURT REPORTER: This deposition is being
2		2	reported remotely by videoconference pursuant to
3	RYAN J. STONEROCK, Esquire	3	the Florida Supreme Court Administrative Order No.
4	Harder, LLP	4	AOSC 20-23.
5	260 Madison Avenue, Sixteenth floor	5	Would counsel indicate your agreement by
6	New York, New York 10016	6	stating your name and your agreement on the
7	rstonerock@harderllp.com	7	record.
8	424-203-1600	8	MR. PHILLIPS: John Phillips, attorney for
9	appearing on behalf of claimant.	9	Omarosa Manigault Newman, and we agree to a Zoom
10	JOHN M. PHILLIPS, Esquire	10	deposition and all the terms thereof.
11	Phillips & Hunt	11	MR. STONEROCK: And Ryan Stonerock on behalf
12	212 North Laura Street	12	of claimant, we also agree.
13	Jacksonville, Florida 32202	13	LUCIA CASTELLANO,
14	jmp@floridajustice.com	14	having been produced and first duly sworn as a witness
15	904-444-4444	15	on behalf of respondent, and after responding "I do" to
16	J. WYNDAL GORDON, Esquire	16	the oath, testified as follows:
17	The Law Office of J. Wyndal Gordon, P.A.	17	DIRECT EXAMINATION
18	20 South Charles Street, Suite 400	18	BY MR. PHILLIPS:
19	Baltimore, Maryland 21201	19	Q I'm going to start off where you can see me,
20	jwgattys@aol.com	20	but then I might go dark as I move my laptop around.
21	410-332-4121	21	But good morning.
22	appearing on behalf of respondent.	22	A Good morning.
23	- - -	23	Q Can you hear me okay?
24		24	A Yes, I can.
25		25	Q Have you ever had your deposition taken

1 before?

2 A Many, many years ago.

3 Q A few rules, and your attorney may have
4 explained them, but just so we have them on the record,
5 this is -- this may take a little while today, but it's
6 at a level of your convenience, too. If you've got to
7 go to the restroom, you need a break, whatever it is,
8 you let us know, and we'll take a timeout.

9 A Okay.

10 Q My only request is that we don't take a
11 timeout when I have a question pending unless it's a
12 super long question. That's my only request.

13 People talk differently than depositions
14 allow. In other words, in normal conversation we
15 shortcut each other and we get to the point.
16 Depositions we've got to make the point because a
17 judge, or in this case arbitrator, may be looking at
18 it. So we've got to -- I'm going to -- please let me
19 finish my sentence, and then I'll let you finish your
20 response.

21 Part B of that is uh-huhs and uh-uhs and
22 comments like that don't come out as well as yes and
23 nos just for purposes of the record. If I ask anything
24 confusing, your attorney may object. But if they don't
25 object, or if Mr. Stonerock doesn't object, but you

1 You can answer, Lucia.
2 THE WITNESS: Yeah, I was part of the Trump
3 administration.

4 BY MR. PHILLIPS:

5 Q Okay. And were you terminated, or did you
6 quit?

7 A No. We were all -- all political appointees
8 are terminated on the day the new president is sworn
9 in.

10 Q Fair enough. So where were you before the
11 Small Business Association?

12 A I worked for the Trump campaign.

13 Q How long did you work for the Trump campaign?

14 A From June through January of '17.

15 Q June?

16 A June of 2016 through January of 2017.

17 Q And where did you work from January of 2017
18 onward?

19 A For the Small Business Administration.

20 Q Okay. When did you start at the Small

21 Business Association?

22 A I believe it was January 31st.

23 Q Okay. Of 2017?

24 A Yes.

25 Q You've worked there concurrently until the

1 still don't understand me, let me know.

2 You've sworn to tell the truth today. That's
3 really important. And you can't really tell the truth
4 to something you didn't understand. But we need to
5 know you didn't understand it before we assume you told
6 the truth; is that fair?

7 A Yes.

8 Q Okay. So state your name for the record,
9 please.

10 A Lucia Castellano.

11 Q And where are you currently employed?

12 A I am not employed.

13 Q Where were you last employed?

14 A For the Small Business Administration.

15 Q Okay. That's a government entity I assume?

16 A Yes.

17 Q And when were you last employed with the
18 Small Business Association?

19 A January 20th, '21.

20 Q Okay. So that coincides with the date of the
21 president change. Does that have anything to do with
22 why you're no longer employed by the government?

23 A Yes, correct.

24 MR. STONEROCK: Calls for speculation, lacks
25 foundation.

1 election; is that fair? Does that sound right?

2 A Yes, correct.

3 MR. STONEROCK: I'm sorry. Vague and
4 ambiguous.

5 John, maybe you could restate the question.

6 MR. PHILLIPS: I mean, some of these are just
7 informational, so I'm not really going to waste
8 the time necessarily. I get it and I appreciate
9 it, but --

10 MR. STONEROCK: It's your deposition.

11 MR. PHILLIPS: I get it.

12 BY MR. PHILLIPS:

13 Q So how did you get a job with the Trump
14 campaign?

15 A I was --

16 MR. STONEROCK: Calls for speculation, lacks
17 foundation.

18 You can answer.

19 THE WITNESS: Okay. I was approached by the
20 deputy campaign manager.

21 BY MR. PHILLIPS:

22 Q Who was that?

23 A Michael Glassner.

24 Q And what did Mr. Glassner say, or how did he
25 approach you?

<p style="text-align: right;">Page 9</p> <p>1 A He asked me if I was available. It was a</p> <p>2 five-month job. And I asked him what it was -- what it</p> <p>3 would be doing, and he said it was the HR director for</p> <p>4 the presidential campaign of Donald Trump.</p> <p>5 BY MR. PHILLIPS:</p> <p>6 Q Where did you work before that, immediately</p> <p>7 before?</p> <p>8 A Just give me a second. It was Citi Bike, the</p> <p>9 bike share organization. I worked for corporate.</p> <p>10 Q Okay. Did you know Mr. Glassner before he</p> <p>11 approached you with this job?</p> <p>12 A No, I did not.</p> <p>13 Q Did you know the Trumps -- did you know</p> <p>14 Donald Trump before Mr. Glassner approached you with</p> <p>15 this job?</p> <p>16 A Personally, no, I did not.</p> <p>17 Q Did you apply for the job with the Trump</p> <p>18 campaign?</p> <p>19 A No.</p> <p>20 MR. STONEROCK: Vague and ambiguous as to the</p> <p>21 term apply.</p> <p>22 BY MR. PHILLIPS:</p> <p>23 Q Do you know how they found you?</p> <p>24 MR. STONEROCK: Calls for speculation, lacks</p> <p>25 foundation.</p>	<p style="text-align: right;">Page 11</p> <p>1 Q Okay. It still has you as HR director at</p> <p>2 Donald J. Trump for President. I assume that's</p> <p>3 probably the last time you updated it.</p> <p>4 A I don't use it. Yeah, obviously.</p> <p>5 Q About you it says you're a senior human</p> <p>6 resources professional. Is that fair and accurate?</p> <p>7 A Yes.</p> <p>8 Q And you've developed and delivered business</p> <p>9 aligned HR programs on a domestic and global scale. Is</p> <p>10 that accurate?</p> <p>11 A Correct.</p> <p>12 Q You have an expertise across a broad range of</p> <p>13 HR disciplines, including recruitment, compensation,</p> <p>14 talent assessment, performance management, and employee</p> <p>15 relations; is that correct?</p> <p>16 A Yes.</p> <p>17 Q And you have the ability to handle day-to-day</p> <p>18 HR activities as well as provide strategic advice and</p> <p>19 guidance; is that correct?</p> <p>20 A Correct.</p> <p>21 Q What is to your best understanding Donald J.</p> <p>22 Trump for President, Inc.?</p> <p>23 MR. STONEROCK: Calls for speculation, calls</p> <p>24 for -- lacks foundation, calls for a legal</p> <p>25 conclusion.</p>
<p style="text-align: right;">Page 10</p> <p>1 You can answer.</p> <p>2 THE WITNESS: Can I answer? Okay. My résumé</p> <p>3 was given to Michael Glassner by a recruiter</p> <p>4 friend of his.</p> <p>5 BY MR. PHILLIPS:</p> <p>6 Q And let's kind of talk about that résumé so I</p> <p>7 can understand a little bit more about you. Where are</p> <p>8 you from? Where is home?</p> <p>9 A Brooklyn, New York City.</p> <p>10 Q Have you lived there your entire life?</p> <p>11 A Entire life.</p> <p>12 Q Okay. And what is your -- I guess what's</p> <p>13 your educational background?</p> <p>14 A High school. No college.</p> <p>15 Q Very good. And did you take any other</p> <p>16 courses or -- no college. Did you take any post high</p> <p>17 school courses, coursework?</p> <p>18 A I took some courses within the bank because I</p> <p>19 worked for an investment bank. So they offered them,</p> <p>20 and I took them.</p> <p>21 Q And the only thing kind of related to your</p> <p>22 résumé that I've seen online is your LinkedIn profile.</p> <p>23 Do you have a LinkedIn profile?</p> <p>24 A I'm not on LinkedIn anymore. I probably have</p> <p>25 a profile, but I no longer go on LinkedIn.</p>	<p style="text-align: right;">Page 12</p> <p>1 You can try to answer if you understand it.</p> <p>2 THE WITNESS: I really don't understand it.</p> <p>3 What is --</p> <p>4 BY MR. PHILLIPS:</p> <p>5 Q Who was your employer when you were --</p> <p>6 A It was Donald J. -- that was the campaign,</p> <p>7 Donald J. Trump for President.</p> <p>8 Q What does a campaign do? From your</p> <p>9 understanding while you were there, what does a</p> <p>10 campaign do?</p> <p>11 A Well, from what I did I can tell you.</p> <p>12 Q Sure.</p> <p>13 A I managed the day-to-day HR functions,</p> <p>14 onboarding, offboarding, processing any invoices that</p> <p>15 came through, managing a group of interns who were</p> <p>16 charged with entering -- you know, opening the daily</p> <p>17 mail and entering the log in of checks to give to the</p> <p>18 treasury group and, you know, many different --</p> <p>19 speaking with managers.</p> <p>20 Q Who was your supervisor while you were there?</p> <p>21 A My direct supervisor was Corey Lewandowski</p> <p>22 and then it was Jeff DeWit.</p> <p>23 Q Are you familiar with a lady named Onarosa</p> <p>24 Manigault Newman?</p> <p>25 A Yes.</p>

Page 13

1 Q How did you become familiar -- or how did you
2 come to know Omarosa Manigault Newman?

3 A She called me and told me that she was going
4 to be working for the campaign.

5 Q Okay. Do you recall that date?

6 A No, I do not.

7 Q And do you have an understanding of what she
8 would be doing for the campaign?

9 A No, I did not.

10 Q What did you do next? When somebody calls
11 and says I'm going to be working for the campaign,
12 what's your next I guess interaction with that person
13 from an HR perspective?

14 A Well, I had to inquire. I don't recall who I
15 actually asked or -- you know, at that point it was
16 just very vague. I had no heads-up on it.

17 Q What do you mean you had no heads-up on it?

18 A I had no idea that she would be working for
19 the campaign.

20 Q Did you know who Omarosa was before that day?

21 A Well, I've heard the name before.

22 Q Did you watch Celebrity Apprentice and were
23 you acquainted with her?

24 A Nope. Never. I was never watching it.
25 Never into it.

Page 14

1 Q Okay. The first -- do you know --
2 COURT REPORTER: I'm sorry. John?
3 MR. PHILLIPS: Yes.
4 COURT REPORTER: Someone has popped up in the
5 waiting room. J. Wyndal, The Warrior Lawyer.
6 MR. PHILLIPS: He's cocounsel. He can come
7 in.
8 COURT REPORTER: Okay. Sorry to interrupt
9 you.
10 MR. PHILLIPS: That's okay.
11 COURT REPORTER: I just wanted to make sure
12 to let him in if I needed to. He's joining.
13 MR. PHILLIPS: He's either very still or
14 that's just a picture.
15 Good morning, Mr. Gordon.
16 MR. GORDON: Good morning. Good morning
17 everyone.
18 BY MR. PHILLIPS:
19 Q So did you -- the e-mail you would have had
20 related to the campaign or related to communications
21 with -- I'm just going to call her Omarosa. Do you
22 still have those, or are they in possession of the
23 campaign?
24 A Oh, no. They're in possession of the
25 campaign.

Page 15

1 Q What was your role related to the -- I think
2 we've abbreviated on nondisclosure agreements. But at
3 the top it just says agreement. So what was your role
4 when it came to the documents known as the NDA?

5 A NDAs were prepared for each person working
6 the campaign.

7 Q Okay. Were they individually prepared,
8 meaning that each -- there were terms that changed from
9 individual to individual?

10 A No.

11 MR. STONEROCK: Calls for speculation, lacks
12 foundation, vague as to time.

13 BY MR. PHILLIPS:
14 Q Okay. And what was your understanding about
15 the purpose of the NDAs?

16 MR. STONEROCK: Calls for a legal conclusion,
17 calls for speculation, lacks foundation, vague as
18 to time.

19 You can answer if you have an understanding.

20 THE WITNESS: Well, just actually what it
21 says, nondisclosure agreement.

22 BY MR. PHILLIPS:
23 Q Okay. And do you know when this was
24 initially brought up with Omarosa, that there was -- do
25 you know when Omarosa became aware that an NDA needed

Page 16

1 to be signed?

2 A Everyone who joins the -- joined the campaign
3 had an NDA. Otherwise, you would not be onboarded.
4 You would not get paid.

5 Q Okay. Did you have an NDA with the campaign?

6 A Yes, I did.

7 Q Was it the same or -- was it the same or
8 substantially similar to the one that Omarosa signed?

9 A Every --

10 MR. STONEROCK: Objection. Objection, not
11 reasonably calculated to lead to admissible
12 evidence.
13 You can answer if you want to, Lucia.
14 THE WITNESS: Okay, Ryan.
15 Every NDA was the same.

16 BY MR. PHILLIPS:
17 Q Okay. From e-mail that I have -- was at any
18 point L-u-c-i-a -- so how do you pronounce your name
19 again?

20 A Lucia.

21 Q Lucia. Was Lucia5856@gmail.com your e-mail
22 at any point?

23 A That is my personal e-mail.

24 Q There's an e-mail to that address carbon
25 copied Lcastellan with no O at Donaldtrump.com. Was

Page 17

1 that also your e-mail?

2 A It was incorrect. She -- the O was left off.

3 Q Okay. There you go. Do you know when

4 related to her work for the campaign that Ms. Manigault

5 Newman signed the NDA?

6 A On or -- late August, probably around late

7 August because there was a bit of back and forth.

8 Q Do you recall what the back and forth was

9 about?

10 A Well, no. She wasn't always in the New York

11 office, very rarely. So, you know, her travels and she

12 had to -- I think it was presented to her by her

13 manager.

14 Q Who was her manager?

15 A I believe it was Alan Cobb.

16 Q I've seen Alan Cobb's name on things.

17 I've -- so what did Alan Cobb do for the campaign?

18 A I really don't remember.

19 Q Fair enough. What did Jason Miller do for

20 the campaign?

21 MR. STONEROCK: Calls for speculation, lacks

22 foundation, vague as to time.

23 If you recall, Lucia, at the time that you

24 were employed, you can answer.

25 THE WITNESS: Jason Miller was part of the

Page 18

1 communications team. What he did on a daily basis

2 I do not know.

3 BY MR. PHILLIPS:

4 Q Fair enough. And then there's another e-mail

5 involving a P. Manafort. I assume that's Paul

6 Manafort. What did he do for the campaign around that

7 time?

8 MR. STONEROCK: Calls for speculation, lacks

9 foundation, vague as to time.

10 You can answer.

11 THE WITNESS: Paul came in after Corey

12 Lewandowski as the campaign manager.

13 BY MR. PHILLIPS:

14 Q Okay. Where was the New York office at that

15 time?

16 A Trump Tower.

17 Q And how many people approximately were day to

18 day in Trump Tower at that time?

19 MR. STONEROCK: You mean for the campaign,

20 John?

21 MR. PHILLIPS: Yes. Yes. Thank you.

22 THE WITNESS: At any given point in time, I'd

23 be guessing if I were to say.

24 BY MR. PHILLIPS:

25 Q That's fine. Are we talking -- just ball

Page 19

1 park. Are we talking five people or 50 people or

2 some -- or hundreds of people?

3 A 25 people maybe.

4 Q Okay. Fair enough. And I'm not going to

5 hold you to that, but just for clarification. And so

6 all 35 or approximately whatever number would have

7 signed the same NDA?

8 A Yes.

9 MR. STONEROCK: Calls for speculation, lacks

10 foundation, vague as to time.

11 BY MR. PHILLIPS:

12 Q Given that Ms. -- did you handle the

13 compensation at all of employees when you were with the

14 campaign?

15 A By that what do you mean, handle the

16 compensation? Determine the compensation or...

17 Q Fair enough. Did you determine the

18 compensation?

19 A For -- not for everyone, no, I did not.

20 Q For Omarosa Manigault Newman were you

21 involved with determining her compensation package?

22 A No, I was not.

23 Q Do you know if she was compensated -- so

24 she -- what is a surrogate related to the campaign?

25 MR. STONEROCK: Vague and ambiguous as to the

Page 20

1 term surrogate, calls for speculation, lacks

2 foundation.

3 You can answer if you know or have --

4 THE WITNESS: I mean, my understanding at the

5 time was that they -- the surrogates all went out

6 and spoke on behalf of the candidate.

7 BY MR. PHILLIPS:

8 Q Were surrogates required to have an NDA; are

9 you aware?

10 MR. STONEROCK: Calls for speculation, lacks

11 foundation.

12 You can answer.

13 THE WITNESS: Okay. My -- if anyone -- in

14 order to be paid, you had to have an NDA. Working

15 for the campaign, you had to have an NDA.

16 BY MR. PHILLIPS:

17 Q Whose mandate was that?

18 MR. STONEROCK: Calls for speculation, lacks

19 foundation, vague and ambiguous as to the term

20 mandate.

21 Do you understand the question?

22 BY MR. PHILLIPS:

23 Q Ms. Castellano, we're going to do this

24 probably all day. And Mr. Stonerock has the right to

25 object. Unless he instructs you specifically not to

Page 21

1 answer, we can probably save a couple seconds each
2 time, you need to answer as best you can.

3 So I guess my question is this to clarify:
4 You've indicated that everybody had to sign an NDA
5 whether a surrogate or employee of the campaign. How
6 did you know that?

7 MR. STONEROCK: Objection, misstates her
8 testimony.

9 BY MR. PHILLIPS:

10 Q Did I misstate your testimony?

11 A Could you repeat that?

12 Q Yeah, sure. Let me just start over. Who was
13 required to sign an NDA with the campaign?

14 A Everyone.

15 MR. STONEROCK: Calls for speculation, lacks
16 foundation, vague as to time.

17 Lucia, just give me one second before
18 answering to enter my objection.

19 THE WITNESS: Yes. I'm sorry.

20 MR. STONEROCK: No problem.

21 BY MR. PHILLIPS:

22 Q Are you speculating that everyone had to sign
23 the NDA?

24 A I joined the campaign late. I joined the
25 campaign in June of '16. All those processes and

Page 22

1 policies were in place when I joined.

2 Q Fair enough. Were those written policies and
3 processes?

4 A Written in a manual?

5 Q Yes.

6 A No.

7 Q Okay. Who told you that every employee of
8 the campaign under your HR -- under your HR department,
9 had to sign an NDA?

10 A It was the campaign manager. It was the
11 legal firm that represented the campaign.

12 Q Who was the legal firm at that time?

13 A I believe it was Jones Day.

14 Q Okay. Was Michael Cohen doing work for the
15 campaign at any point?

16 MR. STONEROCK: Calls for speculation, lacks
17 foundation, vague as to time.

18 You can answer.

19 THE WITNESS: Michael Cohen worked for the
20 Trump organization, not the campaign.

21 BY MR. PHILLIPS:

22 Q Fair enough. Who was the first -- did you
23 say Corey Lewandowski was the first campaign manager
24 when you started?

25 A Correct.

Page 23

1 Q Okay. So Corey Lewandowski would have said
2 everybody needs to sign an NDA. Do you recall him
3 saying that?

4 A No, I do not.

5 Q Okay.

6 A No. I -- Ryan, can I just answer this?

7 MR. STONEROCK: Yes.

8 THE WITNESS: Corey was on the road with the
9 candidate. So my day-to-day interaction was with
10 Glassner. Corey was only there one week and then
11 he left.

12 BY MR. PHILLIPS:

13 Q Okay. So Glassner and the law firm said
14 let's get these NDAs signed for every employee; fair?

15 A Yes.

16 MR. STONEROCK: Hang on a second. Michael
17 Glassner is an attorney. So I just want to be
18 careful in terms of your communications, Lucia,
19 with Michael Glassner as they are privileged to
20 the extent they apply to legal matters. So be
21 careful when he's asking you about those
22 communications.

23 THE WITNESS: Okay.

24 BY MR. PHILLIPS:

25 Q So do you know who -- some of these are going

Page 24

1 to be obvious. I have no clue, so just bear in mind.

2 Do you know who drafted the NDA Omarosa
3 signed?

4 MR. STONEROCK: Calls for speculation, lacks
5 foundation, calls for attorney work product.

6 You can answer, Lucia, if you know.

7 THE WITNESS: Well, the NDAs were a form and
8 a name had to be inserted.

9 BY MR. PHILLIPS:

10 Q Okay. Do you know who drafted that form, who
11 came up with the form?

12 MR. STONEROCK: Same objections.

13 You can answer if you know, Lucia.

14 THE WITNESS: No. I think I'd like a little
15 more clarity on that. Like all of the form in
16 general?

17 BY MR. PHILLIPS:

18 Q Yeah. The agreement that Omarosa signed that
19 you said you signed and other employees signed, same
20 form, do you know who drafted it, who actually came up
21 with it?

22 A That was through --

23 MR. STONEROCK: Calls for speculation, lacks
24 foundation, calls for attorney work product
25 information.

Page 25

1 You can answer, Lucia.

2 THE WITNESS: That was done by campaign legal

3 counsel.

4 BY MR. PHILLIPS:

5 Q Okay. Fair enough. Do you know whether that

6 form was provided by -- well, strike that.

7 Okay. After the campaign some people

8 enter -- it's my understanding enter what's called,

9 what, the transition team?

10 A Yes, the --

11 MR. STONEROCK: Vague and ambiguous, calls

12 for speculation, vague as to time.

13 BY MR. PHILLIPS:

14 Q Okay. Do you know what I mean by transition

15 team, Ms. Castellano?

16 A The transition team came in after the

17 election was won.

18 Q Okay. So we've got a campaign, we've got a

19 victory and election and then there's a transition team

20 before the president is sworn in. Does that sound

21 accurate?

22 A Correct.

23 Q Okay. Were you ever a part of the transition

24 team?

25 A No, I was not.

Page 26

1 Q Were you involved with any HR decisions

2 related to the transition team?

3 A No, I was not.

4 Q Did the transition team have a straight NDA

5 or are you aware or not aware of that?

6 MR. STONEROCK: Calls for speculation, lacks

7 foundation.

8 You can answer if you know.

9 THE WITNESS: No, I had nothing to do with

10 the transition team.

11 BY MR. PHILLIPS:

12 Q Fair enough. And then there's obviously some

13 people went from campaign to transition team to the

14 White House. Did you have anything to do with HR

15 related to the presidency or White House?

16 A No, I did not.

17 Q For people who left the White House and they

18 came back under a consulting agreement with Donald J.

19 Trump for President, were you involved with any of

20 that?

21 MR. STONEROCK: Calls for speculation, lacks

22 foundation, vague and ambiguous as to time.

23 You can answer if you know.

24 THE WITNESS: I'm not sure I understand

25 because I was gone by the end of January. So I

Page 27

1 had nothing to do with the campaign.

2 BY MR. PHILLIPS:

3 Q And nobody could have come back because your

4 last day of service was when President Trump took the

5 oath of office or thereabouts; fair?

6 A Correct, the end of January.

7 Q Okay. Do you know if Ms. Manigault Newman

8 was offered additional compensation when she was asked

9 and signed the NDA?

10 A Could you repeat that?

11 Q Yes. Do you know if Ms. Manigault Newman was

12 given additional compensation for signing the NDA --

13 MR. STONEROCK: Calls for speculation, lacks

14 foundation, vague and ambiguous as to the term

15 additional compensation.

16 THE WITNESS: I'm sorry. I need to turn my

17 phone off. I'm sorry. I'm so sorry. I'm sorry.

18 Would you repeat that for me, please?

19 BY MR. PHILLIPS:

20 Q Fair. Do you know if Ms. Manigault Newman --

21 so she signed the NDA about August 24. Do you know if

22 she was given additional compensation at that time?

23 MR. STONEROCK: Vague and ambiguous as to the

24 term additional compensation.

25 THE WITNESS: Yeah, I'm not sure I understand

Page 28

1 what you mean additional compensation.

2 BY MR. PHILLIPS:

3 Q Was she paid more for signing -- after she

4 signed the NDA or for signing the NDA?

5 A The amount that an individual is paid is

6 determined prior to that.

7 Q Okay. So they're not paid any additional for

8 signing an NDA?

9 MR. STONEROCK: Calls for speculation, lacks

10 foundation, vague and ambiguous as to the term

11 additional compensation.

12 BY MR. PHILLIPS:

13 Q Ms. Castellano, are you aware of any employee

14 that was paid additional for negotiating their rights

15 under an NDA?

16 MR. STONEROCK: Vague and ambiguous as to

17 paid additional, calls for speculation, lacks

18 foundation.

19 You can answer if you understand the

20 question.

21 THE WITNESS: I mean, why would we pay

22 someone additional compensation for signing an

23 NDA? That's just not done.

24 BY MR. PHILLIPS:

25 Q In the Trump campaign it's not done?

Page 29

1 A Not to my knowledge.

2 Q Fair enough. Thank you. More silly

3 questions. Did you write any part of the NDA?

4 A I wrote my name.

5 Q Okay. Fair enough. Did you edit any of the

6 terms of the NDA?

7 MR. STONEROCK: Which NDA, John? Do you

8 mean the --

9 BY MR. PHILLIPS:

10 Q The NDA that Omarosa Manigault signed -- fair

11 enough. Did you -- other than your name, did you write

12 or edit any portion thereof?

13 A No, I did not. You would add my name and the

14 candidate's name. The candidate meaning the potential

15 employee, yes.

16 Q Do you know when you signed -- neither -- in

17 Omarosa's NDA neither -- there's no date in it. Do you

18 know when you signed her NDA?

19 A Most likely to the best of my recollection

20 would be the -- close to the end of August.

21 Q Do you know if Omarosa -- as we sit here

22 today right now just off of your review and preparation

23 for today, do you know if Omarosa signed an NDA with

24 the campaign before that end of August NDA?

25 A Could you repeat that?

Page 30

1 Q Do you know if Omarosa Manigault Newman

2 signed an NDA with the campaign before the one that she

3 and you signed at the end of August?

4 MR. STONEROCK: Calls for speculation, lacks

5 foundation.

6 You can answer if you know.

7 THE WITNESS: To the best of my knowledge

8 that's the only one she signed. That's the only

9 one I received.

10 BY MR. PHILLIPS:

11 Q Were you privy to any of the NDAs that may

12 have been signed before the campaign, for instance,

13 Celebrity Apprentice NDAs?

14 A No.

15 Q Have you ever seen an NDA that Omarosa signed

16 related to the Celebrity Apprentice?

17 A No, I did not.

18 Q Who is responsible for determining whether an

19 employee has violated -- I guess then when you were at

20 the campaign, who was responsible -- who was the

21 responsible person to determine whether an employee

22 violated an NDA?

23 MR. STONEROCK: Vague and ambiguous as to the

24 term violated, calls for speculation, lacks

25 foundation, and calls for a legal conclusion,

Page 31

1 calls for attorney work product as well.

2 You can answer if you know.

3 THE WITNESS: Well, I know it wasn't me,

4 so...

5 BY MR. PHILLIPS:

6 Q Fair enough. I guess -- let me ask it this

7 way: Did you ever refer a Trump campaign employee for

8 suspected violation of the NDA? In other words, you

9 reported something to somebody else, anything like

10 that?

11 A No, I did not.

12 Q Okay. Do you have an opinion as we sit here

13 today whether Omarosa Manigault Newman has violated the

14 NDA?

15 MR. STONEROCK: Objection, calls for a legal

16 conclusion, calls for attorney work product, calls

17 for speculation, lacks foundation.

18 You can answer if you can.

19 THE WITNESS: The opinions are left with

20 legal counsel. They're not mine to make.

21 BY MR. PHILLIPS:

22 Q Fair Enough. Who was the legal counsel that

23 made those decisions?

24 MR. STONEROCK: Calls for speculation, lacks

25 foundation, vague and ambiguous as to time, calls

Page 32

1 for attorney work product.

2 You can answer if you know based upon your

3 experience while you were at the campaign.

4 THE WITNESS: You mean legal counsel for the

5 campaign? I was gone. Remember, I was gone

6 January of '17.

7 BY MR. PHILLIPS:

8 Q Right. But -- and it may be that it just

9 never came up so you had no idea what would happen.

10 But I guess my question is from your understanding from

11 June of 2016 to January of 2017, who would have been

12 responsible for enforcement of the NDA? Who made those

13 decisions?

14 MR. STONEROCK: Calls for legal conclusion,

15 calls for speculation, lacks foundation, calls for

16 attorney work product.

17 You can answer if you know.

18 THE WITNESS: Jones Day.

19 BY MR. PHILLIPS:

20 Q Okay. When did you say the last time was

21 that you gave your deposition?

22 A Oh, probably 20 years ago.

23 Q Okay. So pre -- nothing related to Donald J.

24 Trump or the Trump campaign I assume?

25 A No.

Page 33

1 Q Okay. Fair enough. How many times have you
2 met Donald Trump?

3 MR. STONEROCK: Vague and ambiguous as to the
4 term met.

5 You can answer.
6 BY MR. PHILLIPS:

7 Q When you were working on the campaign, how
8 often would you see Donald Trump?

9 A Oh, he was on the road a lot. Probably in
10 his company maybe eight times in a group setting.

11 Q Okay. And since then how many times have you
12 been in his presence?

13 A I have not.

14 Q So you haven't -- as you're aware, you
15 haven't been -- well, have you been in -- let me just
16 clarify this. Have you been to any I guess events --
17 no, strike that.

18 I'm excluding any events where you were in
19 the audience; okay? So if you attended a campaign
20 event or an event where you're in the audience, exclude
21 that. Excluding events where you're in a large
22 audience, have you been physically in the presence of
23 Donald Trump since January of 2017?

24 A No.

25 Q Have you had phone conversations with him

Page 34

1 since January of 2017?

2 A I'm not that important. No, I have not.

3 Q I beg to disagree, but -- as his former HR
4 director of his campaign, why do you say you're not
5 that important?

6 A I did not have daily interaction with the
7 candidate. I mean, honestly, there were other things
8 he was tending to.

9 Q There's been 298 statements, comments,
10 writings, opinions that have been produced to us that
11 the campaign feels or has alleged that Omarosa has
12 violated her NDA. Have you reviewed those?

13 A I have not. I can do it now if you want me
14 to, but it was provided by counsel.

15 Q Okay. Before we get to your review of that,
16 from somebody who believes they signed the same NDA as
17 Omarosa Manigault Newman, do you believe you have the
18 right to express political opinions regarding the
19 president?

20 MR. STONEROCK: Objection, calls for a legal
21 conclusion, not reasonably calculated to lead to
22 the discovery of admissible evidence, frankly
23 totally irrelevant, and I'm going to instruct her
24 not to answer.

25 BY MR. PHILLIPS:

Page 35

1 Q When you executed this NDA, did you intend to
2 waive your ability to exercise and speak your political
3 opinions?

4 MR. STONEROCK: John, you mean her own NDA?

5 MR. PHILLIPS: I do mean her own NDA.

6 MR. STONEROCK: What does her NDA have to do
7 with any of the issues in this case?

8 MR. PHILLIPS: It's the very same NDA.

9 MR. STONEROCK: Okay. But that --

10 THE WITNESS: Am I on trial?

11 BY MR. PHILLIPS:

12 Q No, I'm just asking, did you intend to waive
13 your political opinions when you signed the NDA?

14 MR. STONEROCK: Same objections. Totally
15 irrelevant to any of the issues in this case. I'm
16 going to also instruct the witness not to answer.

17 BY MR. PHILLIPS:

18 Q Okay. Under your reading of the NDA as an
19 HR -- as the HR professional requiring it to be signed,
20 is it your understanding as the HR director for the
21 Trump campaign at the time it was signed that people
22 would be waiving their ability to express political
23 opinions?

24 MR. STONEROCK: Calls for a legal conclusion,
25 incomplete hypothetical, lacks foundation, calls

Page 36

1 for speculation.

2 You can answer if you understand the
3 question.

4 THE WITNESS: I mean, it's called a
5 nondisclosure agreement specifically for those
6 reasons. And each one is different in the outline
7 of what is required. JPMorgan has them, Chase has
8 them, you know, so any large corporation.
9 Obviously the terms are different, but, you know,
10 I'm not sure what you need on this.

11 BY MR. PHILLIPS:

12 Q Yeah, I'm just trying to understand as the HR
13 professional for the campaign whether it was your
14 understanding that people would be permanently waiving
15 their right to give political speech.

16 MR. STONEROCK: Calls for speculation, lacks
17 foundation, calls for a legal conclusion.

18 You can answer if you understand the
19 question.

20 THE WITNESS: Well, I don't think it stops
21 from having a conversation with a bunch of
22 friends.

23 BY MR. PHILLIPS:

24 Q Where is the line -- where is the -- so you
25 can talk to friends, but you can't talk to the public

Page 37

1 you can't talk to the media?

2 MR. STONEROCK: Calls for a legal conclusion,
3 incomplete hypothetical, calls for speculation,
4 lacks foundation.

5 You can answer if you understand the
6 question.

7 THE WITNESS: I really don't know where we're
8 going with this question.

9 BY MR. PHILLIPS:

10 Q You were the human resources director for the
11 Trump campaign and you also signed one of these NDAs.

12 A Yes.

13 Q You should have some level of understanding
14 of what the restriction was meant to be, and that's
15 what I want to understand. Where's the line as the
16 human resources director or former human resources
17 director for the Trump campaign? What can a person do
18 or not do under this NDA?

19 MR. STONEROCK: Calls for a legal conclusion,
20 lacks foundation, incomplete hypothetical, calls
21 for speculation.

22 You can answer if you understand.

23 THE WITNESS: I mean, it's outlined in the
24 NDA. I could speak to my parents. But, you know,
25 it states disparaging comments, you know. I mean,

Page 38

1 this is someone that I was working for.

2 BY MR. PHILLIPS:

3 Q Donald Trump?

4 A Yes.

5 Q Yes. Well, and a lot of people -- I mean, a
6 lot of people worked for him and a lot of people had a
7 lot of negative things to say about him. And I'm
8 trying to understand. Is that allowed? As the HR --
9 former HR director, where was the line on what could be
10 said? How did you instruct people who were filling
11 these NDAs out what they could do or not do under the
12 NDA?

13 MR. STONEROCK: Incomplete hypothetical,
14 calls for speculation, calls for a legal
15 conclusion, lacks foundation. I don't even
16 understand the question.

17 I'm not -- if you understand it, you can
18 answer it, Lucia.

19 THE WITNESS: Well, I mean, honestly when I
20 did give someone an NDA, I asked them to review it
21 with an attorney if they had any questions.

22 BY MR. PHILLIPS:

23 Q Okay. Did you do that in writing?

24 A No, I did not.

25 Q How did you do that? How did you tell people

Page 39

1 to review it with an attorney?

2 A If they called me or --

3 MR. STONEROCK: Hang on one second. Do you
4 mean -- which people? Do you mean Omarosa
5 specifically, or do you mean generally what her
6 general practice and policy was? Can you clarify,
7 John?

8 BY MR. PHILLIPS:

9 Q Ms. Castellano, did you just say that you
10 recommended people review this with an attorney?

11 A Whenever I gave someone an NDA, I said if you
12 have any questions, after we went through it, you
13 should review it with your attorney.

14 Q And my question is to Omarosa Manigault
15 Newman, did you make that recommendation to her?

16 A Yes.

17 Q In writing?

18 A No.

19 Q In person?

20 A Potentially over the phone.

21 Q How many times have you been in the same room
22 as Omarosa Manigault Newman?

23 A Oh, three times, four times tops.

24 Q What was your understanding as HR director of
25 the Trump campaign about what no disclosure of

Page 40

1 confidential information meant?

2 MR. STONEROCK: Objection, calls for a legal
3 conclusion, incomplete hypothetical. Do you want
4 to put the document in front of her? Do you want
5 her to interpret the agreement?

6 MR. PHILLIPS: I've sent you the document to
7 give to her. So if you have the agreement, could
8 you pull it up, please.

9 MR. STONEROCK: John, you have the ability to
10 share your screen, so you can put it up on your
11 screen.

12 THE WITNESS: I did not write the NDA, so I'm
13 not really clear as to why I'm being badgered
14 about what's in the NDA.

15 BY MR. PHILLIPS:

16 Q You were the human resources director that
17 seems to pride yourself enough on -- where's the
18 LinkedIn -- performance management and employee
19 relations and providing strategic advice and guidance.
20 I'm just trying to understand as both somebody who
21 signed the NDA and somebody who required -- demanded it
22 be signed, did you understand it?

23 MR. STONEROCK: Lacks foundation, calls for a
24 legal conclusion, incomplete hypothetical.

25 You can answer to the extent you understand

Page 41

1 the question.

2 THE WITNESS: I thought it was pretty clear.

3 BY MR. PHILLIPS:

4 Q Okay. So given that it's pretty clear --

5 A I didn't memorize it if that's what you're

6 asking.

7 Q I've sent counsel a copy to provide to you.

8 Do you have a copy of the NDA with you?

9 A I have to pull it up. So I don't know if

10 I -- I'll probably lose you if I do that. What

11 specifically are you looking for?

12 Q The paragraph one, it says no disclosure of

13 confidential information. And I'm just trying to

14 understand as HR director for the Trump campaign at the

15 time what that meant.

16 A Confidential information is exactly what it

17 meant.

18 MR. STONEROCK: Incomplete hypothetical,

19 calls for a legal conclusion, calls for

20 speculation, lacks foundation.

21 Q Ms. Castellano, you're not a lawyer; right?

22 A No, I am not.

23 Q I'm not asking you for any of your legal

24 conclusions. I'm asking you for conclusions related to

25 your role as HR director of the Trump campaign. I'm

Page 42

1 not posing a hypothetical; okay?

2 What I am going to give you is language from

3 the agreement and ask you whether you understood it or

4 not, okay, as HR director who passed this on to other

5 employees and required them to sign it.

6 A Well, the word confidential, I mean, it

7 doesn't mean that I can't share how many pens I had on

8 my desk, but it means I couldn't share confidential

9 information about salary or age or background or...

10 Q Is the fact that Donald Trump loves -- has an

11 appreciation for beautiful women confidential

12 information?

13 MR. STONEROCK: Objection, calls for a legal

14 conclusion, lacks foundation, calls for

15 speculation, incomplete hypothetical.

16 MR. PHILLIPS: Ryan, I don't mind if you

17 object, but could you at least make them make

18 sense. I'm not calling for a legal conclusion.

19 I'm asking the HR director of the Trump campaign

20 whether --

21 MR. STONEROCK: You're asking for application

22 of the NDA to a hypothetical fact that Donald

23 Trump loves beautiful women. That is just pure

24 speculation and lacks foundation. So all of the

25 objections are --

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1 MR. PHILLIPS: But yet it's a complaint that

2 the campaign is making against Omarosa Manigault

3 Newman and seeking millions of dollars for, simply

4 because Trump made no secret of his appreciation

5 for beautiful women, paragraph three of your

6 298-item exhibit. And my question is --

7 MR. STONEROCK: Well, yeah, you didn't cite

8 to that in your question, John. Okay. You took

9 it completely out of context. And you're asking a

10 non-attorney and somebody who hasn't been employed

11 by the campaign for four years to apply the NDA to

12 a statement of claim that was filed long after she

13 left the campaign. She's not -- she's not in a

14 position to answer that question in my opinion.

15 MR. PHILLIPS: Okay. Well, that can be

16 deferred to later.

17 BY MR. PHILLIPS:

18 Q For your understanding as the HR director who

19 implemented this NDA, would it violate confidential

20 information for someone to say Trump made no secret of

21 his appreciation for beautiful women?

22 MR. STONEROCK: Calls for speculation,

23 incomplete hypothetical, lacks foundation, calls

24 for a legal conclusion.

25 Do you understand the question?

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1 THE WITNESS: I think the question is more

2 someone's opinion. How would they know unless

3 they were very, very friendly with the president?

4 BY MR. PHILLIPS:

5 Q Well, the fact that Donald Trump appreciates

6 beautiful women he said on Howard Stern and says

7 publicly; correct?

8 MR. STONEROCK: Calls for speculation, lack

9 of foundation --

10 THE WITNESS: I don't watch Howard Stern.

11 MR. STONEROCK: -- incomplete hypothetical.

12 BY MR. PHILLIPS:

13 Q Let's talk about Donald Trump's affairs. Are

14 those secret?

15 MR. STONEROCK: John.

16 MR. PHILLIPS: You want to amend your

17 complaint?

18 MR. STONEROCK: Really?

19 MR. PHILLIPS: Yes, really. You've sued

20 Omarosa because she said he had an affair.

21 MR. STONEROCK: Okay.

22 MR. PHILLIPS: Repeatedly.

23 MR. STONEROCK: But you need to ask that --

24 you need to ask this witness, John, questions that

25 are within her own personal knowledge. And you

Page 45

1 need to lay a foundation --
 2 MR. PHILLIPS: She was the HR director that
 3 implemented --
 4 MR. STONEROCK: Before I'm going to allow you
 5 to ask her these questions and continue to badger
 6 her, you need to lay a foundation as to how she
 7 has personal knowledge about the facts -- you
 8 know, about the issues that you're asking her
 9 questions about.

10 MR. PHILLIPS: I disagree.

11 MR. STONEROCK: As long as you do that, John,
 12 then we can move forward.

13 BY MR. PHILLIPS:

14 Q As the HR director who implemented and
 15 required Omarosa Manigault Newman to sign this NDA, is
 16 the fact that Donald Trump had an affair confidential
 17 information and a breach of the agreement?

18 MR. STONEROCK: Calls for a legal conclusion,
 19 incomplete hypothetical. I'm going to instruct
 20 Ms. Castellano not to answer the question.

21 BY MR. PHILLIPS:

22 Q Is it public knowledge that Donald Trump had
 23 affairs?

24 MR. STONEROCK: Incomplete hypothetical,
 25 calls for speculation, lacks foundation, vague and

Page 46

1 ambiguous as to the term public knowledge. I'm
 2 going to instruct Ms. Castellano not to answer.

3 BY MR. PHILLIPS:

4 Q Ms. Castellano, have you heard of Stormy
 5 Daniels?

6 A I've heard the name.

7 Q Where have you heard the name?

8 A On the news.

9 Q Are you aware whether there was an admission
 10 by Donald Trump or his attorneys that he had an affair
 11 with Stormy Daniels?

12 MR. STONEROCK: Objection, lacks foundation,
 13 calls for speculation, not reasonably calculated
 14 to lead to the discovery of admissible evidence.

15 You can answer if you understand the
 16 question.

17 THE WITNESS: I really don't know where
 18 you're going with this question. But how would I
 19 know any of that?

20 BY MR. PHILLIPS:

21 Q Okay. Do you watch TV?

22 A Occasionally. I don't watch the news.

23 Q Okay. As HR director -- former HR director
 24 for the Trump campaign, did you -- as former HR
 25 director for the Trump campaign, did you have any

Page 47

1 conversations with anybody with the campaign about what
 2 was meant by no disclosure of confidential information?

3 MR. STONEROCK: This is excluding --
 4 objection, calls for attorney-client privilege
 5 information and attorney work product.

6 Excluding any attorneys, Lucia, you can
 7 answer.

8 THE WITNESS: Sorry. Could you repeat the
 9 question, though?

10 BY MR. PHILLIPS:

11 Q Yes. While you were HR director of the
 12 campaign, did you have any conversations about what "no
 13 disclosure of confidential information" meant?

14 MR. STONEROCK: Same objections. Exclude any
 15 conversations with attorneys.

16 THE WITNESS: With -- and conversations with
 17 individuals on the campaign, with interns, with --

18 BY MR. PHILLIPS:

19 Q Anybody.

20 A Anyone? If they asked, yes.

21 Q And what did you explain?

22 A I explained to them what the agreement was
 23 talking about, exactly that, confidential information.

24 Q Okay. And what was your understanding of
 25 confidential information -- what was confidential

Page 48

1 information while HR director of the Trump campaign?

2 MR. STONEROCK: Calls for a legal conclusion.
 3 You can answer.

4 THE WITNESS: You realize everything in HR is
 5 confidential. So most of the information that I
 6 dealt with on a daily basis was confidential.

7 BY MR. PHILLIPS:

8 Q Right. And I get -- I get business records,
 9 I get -- I get salaries and employee-employer issues, I
 10 get that. But what I'm trying to understand is

11 Ms. Manigault Newman's been sued 298 times essentially
 12 for comments about, you know, whether Donald Trump
 13 hated Obama, whether he had had prior affairs, whether
 14 he used curse words, you know, things like that that
 15 just seem a part of the public conversation, don't
 16 seem confidential information. But you're my H --
 17 you're the person produced to describe to me what the
 18 HR, you know, what -- you're the one that gave Omarosa
 19 this contract. So I'm trying to understand what
 20 confidential information meant. I understand the
 21 context within HR. But is it meant to limit speech
 22 outside of human resources?

23 MR. STONEROCK: Objection, misstates the
 24 statement of claim, calls for a legal conclusion
 25 is a -- the entire question is a run-on question

<p style="text-align: right;">Page 49</p> <p>1 that's vague and ambiguous, and also is an 2 incomplete hypothetical. 3 You can answer if you understand the 4 question. 5 THE WITNESS: I think the question is meant 6 to trip me up in some way. But quite honestly, 7 confidential information, as an adult you would 8 understand what that meant. It was -- it was 9 written about disparaging comments, confidential 10 information. So I'm not sure how much more of 11 that information or how much more it needed to be 12 conveyed to each individual. 13 BY MR. PHILLIPS: 14 Q Okay. There's two paragraphs related to 15 this. There's confidential information in paragraph 16 one and then disparagement under paragraph two, so 17 they're separate. And confidential information I don't 18 think is defined. Oh, yep, it means all information 19 whether or not embodied in any media of a private 20 proprietary or confidential nature or that Mr. Trump 21 insists remain private or confidential, including but 22 not limited to any information with respect to the 23 personal life, political affairs, and/or business 24 affairs of Mr. Trump or any family member, including 25 but not limited to the assets, investments, revenue,</p>	<p style="text-align: right;">Page 51</p> <p>1 can object. Object. Object all you want. I'm 2 here for it. 3 But my question is: From the HR director 4 what level of speech was meant to be -- if she 5 knows, was meant to be restricted under the 6 confidential -- as confidential information. 7 MR. STONEROCK: Objection, calls for a legal 8 conclusion, the document speaks for itself, calls 9 for speculation, lacks foundation, incomplete 10 hypothetical. 11 Do you understand the question? 12 THE WITNESS: No. No, I don't. 13 BY MR. PHILLIPS: 14 Q In as much specificity as possible, tell me 15 how you described and trained employees of the Trump 16 campaign about the prohibition of disclosure of 17 confidential information. 18 MR. STONEROCK: Lacks foundation, calls for 19 speculation, compound. 20 You can answer if you understand. 21 THE WITNESS: There was no training 22 necessary. First of all, can I just explain to 23 you that on a daily basis I managed interns. So 24 the interns were young college students. All of 25 the other individuals that worked for the campaign</p>
<p style="text-align: right;">Page 50</p> <p>1 expenses, taxes, financial statements, actual or 2 prospective business ventures, contracts, alliances, 3 affiliations, relationships, affiliated entities, bids, 4 letters of intent, term sheets, decision strategies, 5 techniques, methods, projections, forecasts, customers, 6 clients, contacts, customer lists, contact lists, 7 schedules, appointments, meetings, conversations, 8 notes, and other communications that Mr. Trump, any 9 family member, any Trump company, or any family member. 10 So what I'm trying to understand is how was 11 that actually conveyed as to what couldn't be said that 12 was deemed confidential at the time you were HR 13 director? 14 MR. STONEROCK: Objection, the question is 15 vague and ambiguous, calls for a legal conclusion. 16 The document speaks for itself. You just read the 17 definition of confidential information, you know, 18 directly from the agreement. 19 Do you want to ask her if she had any 20 discussions with Omarosa about that term? 21 MR. PHILLIPS: If I'd have wanted to ask 22 that, I'd have asked it, Ryan. 23 MR. STONEROCK: I don't understand the 24 question, John. 25 MR. PHILLIPS: I don't need your help. You</p>	<p style="text-align: right;">Page 52</p> <p>1 were adults and they were hardly in the office. 2 They were traveling with the candidate, so I did 3 not see them. I think most people understand 4 those two paragraphs that you're referring to. 5 BY MR. PHILLIPS: 6 Q Are you aware whether Donald Trump hated 7 Muslims? 8 MR. STONEROCK: You can answer based upon 9 your personal knowledge. 10 THE WITNESS: How would I know that? 11 BY MR. PHILLIPS: 12 Q Are you aware whether or not Donald Trump 13 said the N word ever? 14 A No. 15 Q Are you aware of Donald Trump's feelings 16 towards former President Obama? 17 A No. 18 MR. STONEROCK: Calls for speculation, lacks 19 foundation. 20 BY MR. PHILLIPS: 21 Q Are you aware of Donald Trump's marital 22 infidelity? 23 MR. STONEROCK: Calls for speculation, lacks 24 foundation. 25 BY MR. PHILLIPS:</p>

1 Q Are you aware of Donald Trump's marital
2 infidelity?
3 MR. STONEROCK: Calls for speculation, lacks
4 foundation, argumentative.
5 BY MR. PHILLIPS:
6 Q You can answer.
7 A No. Honestly, how would I know that?
8 Q Okay. Are you aware of, referring to page
9 22, number 59, any corruption that went on in the
10 campaign? Are you personally aware of corruption that
11 went on in the campaign?
12 MR. STONEROCK: Calls for speculation, lacks
13 foundation, vague as to the term corruption, vague
14 as to time.
15 You can answer.
16 THE WITNESS: I am not.
17 BY MR. PHILLIPS:
18 Q Are you aware of any corruption that went on
19 in the Trump organization personally?
20 MR. STONEROCK: Calls for a legal conclusion,
21 calls for speculation, lacks foundation, vague as
22 to time, vague as to the term corruption.
23 You can answer.
24 THE WITNESS: I had no dealings with the
25 Trump organization.

1 BY MR. PHILLIPS:
2 Q Please describe in as much specificity as you
3 can any and all conversations you had explaining or
4 training the Trump employees what no disparagement in
5 the no disparagement clause meant.
6 A There really was no training. It's pretty
7 clear. Doesn't the paragraph outline that?
8 Q Yes. It says no disparagement during the
9 term of your service and at all times thereafter. You
10 hereby promise and agree not to demean or disparage
11 publicly the company, Mr. Trump, any Trump company, any
12 family member, or any family member of the company or
13 any asset of the foregoing, own or product or service
14 any of the foregoing offer in each case by or in any of
15 the restricted means in context and to prevent your
16 employees from doing so.
17 In laymen's terms can you tell me what that
18 meant?
19 MR. STONEROCK: Calls for a legal conclusion.
20 MR. PHILLIPS: What in laymen's terms means,
21 non-legal terms.
22 MR. STONEROCK: You're asking for an
23 interpretation of a legal document, John. I don't
24 think just because you say laymen's terms doesn't
25 mean that you're not asking for an interpretation

1 of a legal document.
2 BY MR. PHILLIPS:
3 Q Ms. Castellano, did you have a lawyer consult
4 with you before you signed this agreement?
5 A No, I did not.
6 MR. STONEROCK: Objection, relevance.
7 BY MR. PHILLIPS:
8 Q Why not?
9 MR. STONEROCK: Objection, relevance. You
10 don't have to answer that question if you don't
11 want to, Ms. Castellano.
12 MR. PHILLIPS: Are you instructing the
13 witness not to answer?
14 MR. STONEROCK: I'll leave it up to her.
15 THE WITNESS: No. I understood what I was
16 signing.
17 BY MR. PHILLIPS:
18 Q Then what does no disparagement -- the no
19 disparagement clause mean?
20 MR. STONEROCK: Objection, calls for a legal
21 conclusion.
22 BY MR. PHILLIPS:
23 Q In laymen's terms what did that mean to you?
24 MR. STONEROCK: Same objection. The document
25 speaks for itself.

1 BY MR. PHILLIPS:
2 Q Ms. Castellano, in laymen's terms what did
3 the non-disparagement clause mean to you?
4 MR. STONEROCK: Same objections.
5 Do you want to -- Mr. Phillips read from the
6 document. Do you have the document in front of
7 you?
8 THE WITNESS: No, I do not.
9 MR. STONEROCK: Why don't you take a look at
10 it, of course, subject to the same objections. It
11 calls for a legal conclusion and the document
12 speaks for itself. You can try to answer the
13 question.
14 MR. PHILLIPS: Let's just take -- we've gone
15 an hour. Let's take a break so she can pull it
16 up. I mean, I can try, but that's why I sent it
17 via e-mail.
18 MR. STONEROCK: There are ways, John,
19 obviously where you could put it up on the screen
20 so we could all be looking at it right now. You
21 can share your screen. You have it on your
22 computer.
23 MR. PHILLIPS: There's also ways for you to
24 prepare your witnesses with the stuff that I --
25 MR. STONEROCK: Yeah, well, I mean, if you

1 send me a document 15 minutes before the
2 deposition and you know --

3 MR. PHILLIPS: That was sent last night. The
4 ones sent today were --

5 MR. STONEROCK: Oh, sorry, last night. I
6 can't -- you sent documents at both times, so --

7 MR. PHILLIPS: Okay. We'll take a break and
8 hopefully she can get it up.

9 MR. STONEROCK: It's more a reflection of
10 your lack of preparation than ours.

11 MR. PHILLIPS: It's hard for you to lecture
12 me on lack of preparation when you send me a
13 complaint like this and can't get a witness to
14 answer or provide damages. But go right ahead.

15 COURT REPORTER: I'm now pausing the
16 recording.

17 (Brief recess.)

18 BY MR. PHILLIPS:

19 Q Ms. Castellano, were you able to find the
20 agreement? Were you able to find the agreement?

21 A Yes. Just bear with me one second.

22 Q Okay.

23 A Okay. I have it.

24 Q And is it -- can you turn to page 5. Is it
25 the one signed by you and Omarosa at the time

1 Q You --

2 MR. STONEROCK: Ms. Castellano, he's asking
3 you about your conversations with campaign
4 employees regarding this provision. Do you recall
5 any conversations with campaign employees about
6 this provision?

7 THE WITNESS: Only with the interns. No one
8 had questions on it other than them.

9 BY MR. PHILLIPS:

10 Q So what questions did the interns have?

11 A When they received checks from donors, you
12 know, am I allowed to talk about this? And I was like,
13 no, you are not.

14 Q Okay. Any other questions that you answered
15 from interns or anybody else about the no disclosure of
16 confidential information paragraph?

17 A Not to my recollection.

18 Q Would -- and I know I'm taking you back a few
19 years, but let's say Donald Trump is on Access
20 Hollywood or is, you know, being filmed and says to
21 Billy Bush, "I don't even wait. And when you're a
22 star, they let you do it. You can do anything. Grab
23 them by the pussy. You can do anything."

24 So let's say Donald Trump says that. Can the
25 interns talk about that the next day without violating

1 Manigault, now Manigault Newman?

2 A No, it is not. It's the other -- it's signed
3 by Omarosa.

4 Q Okay. And that's fine. That will be the --
5 I mean, if that's the one she signed, we know you
6 signed it after the fact. That's -- you can refer to
7 that one.

8 A Okay. Where am I looking?

9 Q The paragraph 1, page 1 note, disclosure of
10 confidential information. You indicated to some extent
11 that you explained that to employees or had
12 communications about that with employees. And I just
13 want to understand now that you've had a chance to
14 review it what the substance of those conversations
15 were as HR director of the Trump campaign.

16 MR. STONEROCK: Objection, misstates her
17 testimony.

18 You can answer.

19 THE WITNESS: And you're looking at the first
20 paragraph?

21 BY MR. PHILLIPS:

22 Q The number one paragraph. No disclosure --

23 A No disclosure of -- right, during the term of
24 your service. Okay. I think I explained it to you
25 before.

1 the disclosure -- no disclosure of confidential
2 information?

3 MR. STONEROCK: Objection, incomplete
4 hypothetical, calls for a legal conclusion, lacks
5 foundation.

6 You can answer if you understand the
7 question.

8 THE WITNESS: I understand. But they were
9 not allowed to have that -- any discussions.

10 BY MR. PHILLIPS:

11 Q Any discussions whatsoever about President
12 Trump?

13 MR. STONEROCK: Misstates her testimony.

14 BY MR. PHILLIPS:

15 Q Any -- please explain.

16 A I lost the video. I'm sorry.

17 Q That's okay. Let's back up. You said they
18 weren't allowed to have any discussions. I think
19 that's what you said.

20 A But you were referring to -- you referred to
21 Billy Bush.

22 Q I did. But I said could the interns then
23 talk about that the next day? That was all over the
24 nation about Donald Trump saying you can grab them by
25 the pussy. What I'm trying to -- excuse my language.

<p style="text-align: right;">Page 61</p> <p>1 What I'm trying to understand is: Could the</p> <p>2 interns talk about that the next day amongst</p> <p>3 themselves, publicly?</p> <p>4 MR. STONEROCK: Calls for a legal conclusion,</p> <p>5 incomplete hypothetical, compound, vague and</p> <p>6 ambiguous.</p> <p>7 You can answer if you understand the</p> <p>8 question.</p> <p>9 THE WITNESS: I'm trying to get the video</p> <p>10 back. I'm so sorry. I don't know what happened.</p> <p>11 I can't get the video back. It's driving me</p> <p>12 crazy.</p> <p>13 MR. STONEROCK: We can see you.</p> <p>14 THE WITNESS: You can see me going crazy?</p> <p>15 MR. STONEROCK: Yes, and hear you.</p> <p>16 THE WITNESS: Oh, I got it. I'm sorry.</p> <p>17 So you're asking me if the interns were</p> <p>18 allowed to talk amongst themselves?</p> <p>19 MR. PHILLIPS: Yes.</p> <p>20 MR. STONEROCK: About the Billy Bush tape?</p> <p>21 MR. PHILLIPS: About -- yeah, the Billy Bush</p> <p>22 tape.</p> <p>23 MR. STONEROCK: Calls for legal conclusion,</p> <p>24 incomplete hypothetical.</p> <p>25 You can answer if you have an understanding.</p>	<p style="text-align: right;">Page 63</p> <p>1 Q And what were the boundaries?</p> <p>2 MR. STONEROCK: Calls for a legal conclusion,</p> <p>3 incomplete hypothetical.</p> <p>4 BY MR. PHILLIPS:</p> <p>5 Q As HR director and countersigner of the NDA</p> <p>6 for the Trump campaign, what were the boundaries?</p> <p>7 MR. STONEROCK: Objection, calls for a legal</p> <p>8 conclusion, incomplete hypothetical.</p> <p>9 You're asking the boundaries of the NDA?</p> <p>10 MR. PHILLIPS: She said they knew the</p> <p>11 boundaries, and I asked what the boundaries are as</p> <p>12 countersigner of the NDA and HR director for the</p> <p>13 Trump campaign.</p> <p>14 MR. STONEROCK: Again, calls for a legal</p> <p>15 conclusion, incomplete hypothetical.</p> <p>16 BY MR. PHILLIPS:</p> <p>17 Q Ms. Castellano, what were the boundaries you</p> <p>18 just discussed?</p> <p>19 A Negativity --</p> <p>20 MR. STONEROCK: Objection.</p> <p>21 BY MR. PHILLIPS:</p> <p>22 Q Negativity is a boundary?</p> <p>23 A Negative comments.</p> <p>24 Q So you can make -- a person who's signed this</p> <p>25 agreement can make no negative comments about the</p>
<p style="text-align: right;">Page 62</p> <p>1 THE WITNESS: And the answer is no. They</p> <p>2 should not have been discussing that.</p> <p>3 BY MR. PHILLIPS:</p> <p>4 Q Okay. Why not?</p> <p>5 MR. STONEROCK: Calls for a legal conclusion,</p> <p>6 incomplete hypothetical.</p> <p>7 BY MR. PHILLIPS:</p> <p>8 Q As HR director of the Trump campaign and</p> <p>9 person responsible for countersigning the NDAs, why</p> <p>10 not?</p> <p>11 MR. STONEROCK: Calls for legal conclusion,</p> <p>12 incomplete hypothetical.</p> <p>13 THE WITNESS: These were comments made</p> <p>14 apparently. Was it true? We don't know. I</p> <p>15 mean --</p> <p>16 BY MR. PHILLIPS:</p> <p>17 Q I'm not concerned about the veracity of what</p> <p>18 was said. What I'm concerned about --</p> <p>19 A I understand what -- I understand where</p> <p>20 you're going. And I was never in the same room with</p> <p>21 the interns. I had my own office. They knew better.</p> <p>22 They were all Trump supporters. If they walked out to</p> <p>23 lunch and had a conversation, I wasn't privy to it.</p> <p>24 But they were pretty -- pretty mature for interns and</p> <p>25 knew the boundaries.</p>	<p style="text-align: right;">Page 64</p> <p>1 president whatsoever?</p> <p>2 MR. STONEROCK: Incomplete hypothetical,</p> <p>3 calls for a legal conclusion.</p> <p>4 BY MR. PHILLIPS:</p> <p>5 Q What did you mean by negativity?</p> <p>6 A Isn't that what disparaging means?</p> <p>7 Q You tell me how you interpret it as HR</p> <p>8 director and countersigner of the agreement.</p> <p>9 A That's how --</p> <p>10 MR. STONEROCK: Calls for a legal conclusion.</p> <p>11 THE WITNESS: Sorry, Ryan.</p> <p>12 MR. STONEROCK: You can answer.</p> <p>13 THE WITNESS: That's how I interpret it.</p> <p>14 BY MR. PHILLIPS:</p> <p>15 Q Okay. So as countersigner of the agreement</p> <p>16 and HR director for the Trump campaign, you would have</p> <p>17 instructed that there can be no negative comments about</p> <p>18 the campaign, Mr. Trump, or his family as a result of</p> <p>19 signing this agreement?</p> <p>20 MR. STONEROCK: Objection, misstates her</p> <p>21 testimony, calls for a legal conclusion.</p> <p>22 You can answer if you understand the</p> <p>23 question.</p> <p>24 THE WITNESS: Yeah, that's correct.</p> <p>25 BY MR. PHILLIPS:</p>

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1 Q Is that forever?
 2 MR. STONEROCK: Calls for a legal conclusion,
 3 incomplete hypothetical.
 4 BY MR. PHILLIPS:
 5 Q Does that requirement last forever?
 6 MR. STONEROCK: Objection, calls for a legal
 7 conclusion, lacks foundation, incomplete
 8 hypothetical.
 9 This is something that, you know, the
 10 arbitrator is going to decide, Mr. Phillips.
 11 MR. PHILLIPS: She is countersigner of the
 12 agreement.
 13 BY MR. PHILLIPS:
 14 Q As countersigner of the agreement, meaning
 15 you signed this, you bound this, you bound the
 16 campaign, you bound -- you made this a contract. Did
 17 you intend that agreement that you cannot say anything
 18 negative about the president or the candidate or his
 19 family to last forever?
 20 MR. STONEROCK: Did you have -- objection,
 21 calls for a legal conclusion, calls for
 22 speculation, lacks foundation.
 23 To the extent you had any intention when you
 24 signed it, you can answer.
 25 THE WITNESS: I signed it, yes, representing

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1 the campaign, but the employee also signed it.
 2 BY MR. PHILLIPS:
 3 Q Correct. And your understanding at the time
 4 you signed it that this was to -- what was your
 5 understanding at the time you signed it was for how
 6 long this would last?
 7 MR. STONEROCK: Objection, calls for a legal
 8 conclusion.
 9 Did you have an understanding as to --
 10 THE WITNESS: My understanding was that it
 11 would last forever.
 12 BY MR. PHILLIPS:
 13 Q Okay. Thank you. So no negativity. Does it
 14 matter -- you know, as HR director and countersigner to
 15 the agreement, does it matter that Donald Trump was
 16 elected president?
 17 MR. STONEROCK: Calls for speculation,
 18 incomplete hypothetical, calls for a legal
 19 conclusion, vague and ambiguous as to term matter.
 20 Do you have --
 21 THE WITNESS: Do you want me to answer that?
 22 MR. STONEROCK: Do you have an opinion? I
 23 mean, he's asking you for a legal opinion. I
 24 mean --
 25 MR. PHILLIPS: No, I'm not.

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1 BY MR. PHILLIPS:
 2 Q As countersigner to the agreement and as HR
 3 director for the Trump campaign, do you know whether
 4 this agreement -- you said this agreement is
 5 enforceable forever. Do you know if this is
 6 enforceable or became -- was still enforceable once
 7 Trump became president? Do you know?
 8 MR. STONEROCK: Calls for a legal conclusion,
 9 incomplete hypothetical.
 10 You mean as she sits here today?
 11 MR. PHILLIPS: Does she know whether this
 12 agreement was affected by Trump getting elected
 13 president?
 14 MR. STONEROCK: Calls for a legal conclusion,
 15 incomplete hypothetical.
 16 Do you have any -- do you know?
 17 THE WITNESS: Do I know? I would think it
 18 would be more enforceable as he was the president
 19 of the United States.
 20 BY MR. PHILLIPS:
 21 Q Very good. Thank you for that. What about
 22 positive comments, what about -- what about I guess
 23 that's not positive -- strike that.
 24 Do you know if the agreement covers,
 25 restricts saying confidential nice things about the

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1 president?
 2 MR. STONEROCK: Objection, calls for a legal
 3 conclusion, incomplete hypothetical.
 4 BY MR. PHILLIPS:
 5 Q Ms. Castellano, as countersigner of this
 6 agreement --
 7 MR. STONEROCK: Vague and ambiguous as to
 8 positive and nice.
 9 BY MR. PHILLIPS:
 10 Q Ms. Castellano, do you know what saying nice
 11 things means?
 12 A Like he's a great guy or --
 13 Q Yeah.
 14 A -- he's fair or we love him, his energy is
 15 amazing? Sure, I --
 16 Q His business acumen is the best in the world
 17 and what he's done with the Trump organization has not
 18 been matched in the history of mankind. Would that be
 19 allowed to be said in your opinion as countersigner of
 20 the NDA and as HR director for the Trump -- Donald J.
 21 Trump for President, Inc.?
 22 MR. STONEROCK: Objection, calls for a legal
 23 conclusion, incomplete hypothetical.
 24 THE WITNESS: It doesn't fall under the
 25 category of disparaging.

1 BY MR. PHILLIPS:

2 Q But would it be confidential information if
3 you're talking about Donald Trump's business acumen and
4 his success in his company?

5 MR. STONEROCK: Objection, calls for a legal
6 conclusion, incomplete hypothetical. The document
7 speaks for itself.

8 THE WITNESS: You're trying to make the
9 nondisclosure into something that it's not.

10 BY MR. PHILLIPS:

11 Q Why do you say that? What do you mean?

12 A Because you're talking now about what a
13 wonderful businessman he is, what he did with the Trump
14 organization. Those are glowing remarks.

15 Q Okay.

16 A Okay.

17 Q I get that. But if I'm talking about
18 somebody's business -- and I'm just trying to
19 understand. You signed it. But it seems to me that
20 confidential information is confidential information
21 regardless of whether it's naughty or nice; right?

22 MR. STONEROCK: Calls for a legal conclusion,
23 incomplete hypothetical, vague as to the terms
24 naughty and nice.

25 THE WITNESS: You know, everyone in New York

1 his sexual proclivity.

2 Do you know if a statement like that if
3 broadcast by Howard Stern would have been heard by
4 people in New York?

5 MR. STONEROCK: Calls for speculation, lacks
6 foundation.

7 You can answer if you understand the
8 question.

9 THE WITNESS: I mean, Howard Stern is Howard
10 Stern. Like I said, I don't listen to him. I'm
11 sure the people of New York hear a lot of things
12 whether or not they're true.

13 BY MR. PHILLIPS:

14 Q If a person who worked for the campaign
15 talked about what they heard on Howard Stern related to
16 Donald Trump's own words, would that be disparaging if
17 they said, well, Donald Trump said that his sexual
18 proclivity -- more people died from sex than Vietnam
19 and Donald Trump deserved a Congressional Medal of
20 Honor because of his sexual proclivity, would that be
21 confidential information -- releasing confidential
22 information or would that be disparagement? Where
23 would that fall under the agreement?

24 MR. STONEROCK: Calls for speculation, lacks
25 foundation, incomplete hypothetical, calls for a

1 knows Donald Trump. So everyone knew what a
2 successful businessman he was, plain and simple.

3 BY MR. PHILLIPS:

4 Q Do people know about his bankruptcies?

5 MR. STONEROCK: Calls for speculation, lacks
6 foundation, vague as to time, incomplete
7 hypothetical.

8 BY MR. PHILLIPS:

9 Q Did people in New York accuse him of rape?

10 MR. STONEROCK: Calls for speculation, lacks
11 foundation, argumentative.

12 BY MR. PHILLIPS:

13 Q Do you know that? Do you know whether Donald
14 Trump had bankruptcies before running his campaign?

15 A No idea.

16 Q Do you know whether he was accused of rape
17 before running for president?

18 A No, I do not.

19 Q Do you know if Donald Trump said that -- let
20 me get it correct -- they say that more people were
21 killed by women in this act, meaning the act of sexual
22 intercourse, than killed in Vietnam. And Trump said,
23 you know, you get criticized for that statement, but
24 the statement is very easily true. And then basically
25 says he should get the Congressional Medal of Honor for

1 legal conclusion.

2 John, you can ask her questions based upon
3 her personal knowledge. If you're going to
4 continue to, you know, ask her to apply the NDA to
5 specific instances, I'm going to continue to
6 object. I'm going to instruct her not to answer.

7 MR. PHILLIPS: Okay.

8 MR. STONEROCK: I mean, I've given you some
9 rope here in term of asking her to apply and
10 interpret the terms of the NDA, but she's a lay
11 witness. That is not within, you know, her
12 personal knowledge. And so if you want to
13 rephrase the question to ask if she has any
14 personal knowledge of these things, that's fine,
15 you know. I'm fine with her answering those
16 things.

17 MR. PHILLIPS: Thank you, Mr. Stonerock. She
18 signed the agreement. She's the contracting party
19 on behalf of the president, the Donald J. Trump
20 for President, Inc. She also trained on --

21 MR. STONEROCK: I don't want --

22 MR. PHILLIPS: Excuse me. Let me finish.
23 She also trained on the agreement, trained people
24 on the agreement.

25 MR. STONEROCK: You're misstating her

<p style="text-align: right;">Page 73</p> <p>1 testimony. She never said she trained somebody --</p> <p>2 anybody on the agreement.</p> <p>3 MR. PHILLIPS: Didn't you train interns or</p> <p>4 discuss the agreement with interns?</p> <p>5 MR. STONEROCK: Training and discussing are</p> <p>6 two different things; okay?</p> <p>7 MR. PHILLIPS: Hey, let the witness answer,</p> <p>8 please. Don't coach her.</p> <p>9 MR. STONEROCK: Well, ask a proper question.</p> <p>10 I mean, you want to ask a complete question.</p> <p>11 BY MR. PHILLIPS:</p> <p>12 Q Ms. Castellano, did you train interns about</p> <p>13 the agreement or discuss the agreement?</p> <p>14 A There was no training. Training to me as an</p> <p>15 HR person is a training, going through word by word.</p> <p>16 There was no training.</p> <p>17 Q Okay. There was no training. Did you have a</p> <p>18 conversation providing enlightenment or education to</p> <p>19 any employees, including interns, with Donald J. Trump</p> <p>20 for President?</p> <p>21 MR. STONEROCK: Objection, vague as to the</p> <p>22 terms enlightenment or education. And you've also</p> <p>23 asked and answered similar questions on numerous</p> <p>24 occasions by this point.</p> <p>25 BY MR. PHILLIPS:</p>	<p style="text-align: right;">Page 75</p> <p>1 ambiguous as to the term one-on-one guidance.</p> <p>2 You can answer.</p> <p>3 THE WITNESS: I think I already answered</p> <p>4 that. If they came to me and had a question, we</p> <p>5 discussed it.</p> <p>6 BY MR. PHILLIPS:</p> <p>7 Q Did they come to you?</p> <p>8 A I don't recall if they came to me. You're</p> <p>9 talking five years ago.</p> <p>10 Q Okay. As countersigner of the agreement and</p> <p>11 HR director for Donald J. Trump for President, is your</p> <p>12 understanding that this agreement sought to prohibit</p> <p>13 both fact statements and opinion statements about</p> <p>14 Donald Trump, the Trump campaign, his family, and those</p> <p>15 otherwise mentioned in the agreement?</p> <p>16 MR. STONEROCK: Calls for a legal conclusion,</p> <p>17 incomplete hypothetical, document speaks for</p> <p>18 itself.</p> <p>19 You can answer if you understand the</p> <p>20 question.</p> <p>21 THE WITNESS: I really don't.</p> <p>22 You want to repeat it for me, John?</p> <p>23 BY MR. PHILLIPS:</p> <p>24 Q Yeah, sure. My question essentially was</p> <p>25 whether under the nondisclosure of confidential</p>
<p style="text-align: right;">Page 74</p> <p>1 Q You can answer. Did you provide</p> <p>2 enlightenment or education or discussion with interns</p> <p>3 or other employees about the NDA?</p> <p>4 MR. STONEROCK: Same objection.</p> <p>5 THE WITNESS: If they asked.</p> <p>6 BY MR. PHILLIPS:</p> <p>7 Q If they asked. But we're talking about the</p> <p>8 past tense. Did they ask? Did you have these</p> <p>9 conversations?</p> <p>10 A I think I answered that already.</p> <p>11 Q Well, the problem is we're -- we can't even</p> <p>12 agree on what training means. Training you said means</p> <p>13 like a seminar or session. I'm talking one-on-one</p> <p>14 human resource.</p> <p>15 If I have an employee who is doing something</p> <p>16 wrong, I don't need to involve the whole office</p> <p>17 sometimes. I can go to that employee and say, listen,</p> <p>18 this is what you need to do better with.</p> <p>19 Isn't that training, too, one-on-one</p> <p>20 coaching?</p> <p>21 MR. STONEROCK: Objection, calls for a legal</p> <p>22 conclusion, incomplete hypothetical.</p> <p>23 BY MR. PHILLIPS:</p> <p>24 Q Isn't one-on-one guidance training?</p> <p>25 MR. STONEROCK: Objection, vague and</p>	<p style="text-align: right;">Page 76</p> <p>1 information section or non-disparagement as</p> <p>2 countersigner of the agreement and HR director for the</p> <p>3 Trump campaign, was that intended to prohibit both fact</p> <p>4 statements and opinion statements?</p> <p>5 So in other words, I think Donald Trump's</p> <p>6 hair is terrible. Would that have been prohibited by</p> <p>7 the agreement?</p> <p>8 MR. STONEROCK: Objection, calls for a legal</p> <p>9 conclusion, incomplete hypothetical.</p> <p>10 You can answer to the extent you understand</p> <p>11 the question.</p> <p>12 THE WITNESS: I mean, it's somebody's</p> <p>13 opinion. But, yes, it's negative. What you just</p> <p>14 said was negative.</p> <p>15 BY MR. PHILLIPS:</p> <p>16 Q So that would be -- that would be prohibited</p> <p>17 by the agreement as countersigner to the agreement?</p> <p>18 MR. STONEROCK: Objection, calls for a legal</p> <p>19 conclusion, incomplete hypothetical, vague as to</p> <p>20 time.</p> <p>21 BY MR. PHILLIPS:</p> <p>22 Q Would that be prohibited?</p> <p>23 MR. STONEROCK: Same objections.</p> <p>24 Do you have an opinion as to whether that</p> <p>25 would be prohibited, Lucia?</p>

1 THE WITNESS: I don't. I'll defer to you.
 2 BY MR. PHILLIPS:
 3 Q Well, he's not -- I can't depose him. So let
 4 me reask the question then.
 5 As countersigner to the agreement, meaning
 6 you signed it, as HR director and as somebody that may
 7 have trained employees on the agreement, I'm trying to
 8 understand, what you would have trained --
 9 A There was no training on the agreement.
 10 Q Okay.
 11 A You have -- you keep saying training.
 12 Q You said maybe you did, maybe you didn't talk
 13 to people about what it meant.
 14 MR. STONEROCK: John, those are two different
 15 things, training and talking to people about the
 16 agreement. I think she was asked and answered the
 17 question numerous times about whether or not she
 18 trained employees on the agreement. The answer is
 19 no.
 20 BY MR. PHILLIPS:
 21 Q Okay. Let's find a word you're comfortable
 22 with. You might have counseled individuals about the
 23 agreement? You may have discussed the agreement? What
 24 are you comfortable with?
 25 A If someone had a question, okay, and they

1 asked me, then we sat down and I explained them. These
 2 were nondisclosure agreements prepared by legal
 3 counsel.
 4 And as I said, if anyone had a question about
 5 them, I referred them to speak to their counsel if they
 6 didn't understand something. It was pretty clear to
 7 everyone who signed it.
 8 Q Okay. And that's what -- if it's pretty
 9 clear and you both signed it and you were -- by the
 10 way, who signed your agreement? So did you sign it in
 11 both places as HR director and as signatory, or did
 12 somebody else sign your agreement?
 13 MR. STONEROCK: Objection, relevance.
 14 You can answer if you recall.
 15 THE WITNESS: How could I possibly sign my
 16 own agreement?
 17 BY MR. PHILLIPS:
 18 Q That's what I'm wondering. That's why I
 19 asked the question. Do you know who signed yours?
 20 A I do not. But I just signed where my name
 21 was. I did not sign on behalf of the campaign.
 22 Q And why is it important for somebody to sign
 23 on behalf of the campaign?
 24 MR. STONEROCK: Objection, calls for a legal
 25 conclusion, vague and ambiguous as to the term

1 important.
 2 You can answer if you --
 3 THE WITNESS: Yeah. I mean, the importance
 4 of the NDA was also so that the individual would
 5 be paid. Without a signed NDA, no one could work
 6 for the campaign, and they would not be paid.
 7 BY MR. PHILLIPS:
 8 Q Are you aware that Omarosa Manigault Newman
 9 was being paid before signing the NDA?
 10 MR. STONEROCK: Calls for speculation, lacks
 11 foundation.
 12 You can answer if you know.
 13 THE WITNESS: Well, I don't know what you
 14 mean by being paid.
 15 BY MR. PHILLIPS:
 16 Q Ms. Manigault Newman was being compensated
 17 before she signed the NDA. Do you have any evidence to
 18 dispute that?
 19 A I didn't know that.
 20 Q Okay.
 21 MR. STONEROCK: It's because it's not true.
 22 MR. PHILLIPS: (Inaudible).
 23 COURT REPORTER: I couldn't hear you, John.
 24 BY MR. PHILLIPS:
 25 Q I said who would have those records,
 1 Ms. Castellano, payment records?
 2 MR. STONEROCK: Calls for speculation, lacks
 3 foundation.
 4 THE WITNESS: Who would have those records?
 5 Possibly the individuals that received all of our
 6 invoices.
 7 BY MR. PHILLIPS:
 8 Q Do you know -- as you sit here today, do you
 9 know whether Ms. Manigault Newman was compensated in
 10 any way by the campaign before August 20 -- do you know
 11 whether Omarosa Manigault Newman was paid before she
 12 signed the campaign by the campaign? Excuse me. Do
 13 you know whether or not Omarosa Manigault Newman was
 14 paid by the campaign before she signed her NDA?
 15 MR. STONEROCK: Asked and answered.
 16 You can answer again.
 17 THE WITNESS: I do not.
 18 BY MR. PHILLIPS:
 19 Q Do you know anything about the campaign
 20 finance reform laws?
 21 MR. STONEROCK: Objection, calls for a legal
 22 conclusion, vague and ambiguous as to campaign
 23 finance reform laws. You can answer.
 24 THE WITNESS: I do not.
 25 BY MR. PHILLIPS:

<p style="text-align: right;">Page 81</p> <p>1 Q Do you know what the maximum contribution is</p> <p>2 that a person could give a political candidate?</p> <p>3 MR. STONEROCK: John, I think your</p> <p>4 microphone --</p> <p>5 MR. PHILLIPS: Oh, sorry.</p> <p>6 MR. STONEROCK: You hit it when you were</p> <p>7 shuffling your papers. Can you repeat?</p> <p>8 MR. PHILLIPS: Yeah, sure.</p> <p>9 BY MR. PHILLIPS:</p> <p>10 Q Ms. Castellano, do you know what the maximum</p> <p>11 donation is that a person can give a political</p> <p>12 campaign?</p> <p>13 MR. STONEROCK: Calls for a legal conclusion.</p> <p>14 You can answer if you know.</p> <p>15 THE WITNESS: I'm not sure of the number</p> <p>16 honestly.</p> <p>17 BY MR. PHILLIPS:</p> <p>18 Q Did you ever work with an individual named</p> <p>19 Noel Casler?</p> <p>20 A Noel Casler?</p> <p>21 Q Yes.</p> <p>22 A I don't recall.</p> <p>23 Q Did you ever work with an individual named</p> <p>24 David Bossie, B-o-s-s-i-e?</p> <p>25 A David was at the campaign.</p>	<p style="text-align: right;">Page 83</p> <p>1 privileged information, attorney work product</p> <p>2 information, vague and ambiguous as to the term</p> <p>3 involved.</p> <p>4 THE WITNESS: No, I have not. I have no</p> <p>5 knowledge.</p> <p>6 BY MR. PHILLIPS:</p> <p>7 Q Okay. Who is Jessica Denson?</p> <p>8 A Another campaign employee.</p> <p>9 Q Are you aware of her claims against the</p> <p>10 campaign involving sexual harassment?</p> <p>11 A I'm going to defer to counsel on this one.</p> <p>12 MR. STONEROCK: You can answer, Lucia, if</p> <p>13 you're aware of them or whether you're aware of</p> <p>14 them or not.</p> <p>15 THE WITNESS: There was a claim. There was a</p> <p>16 claim brought against her, but I have not been</p> <p>17 involved.</p> <p>18 BY MR. PHILLIPS:</p> <p>19 Q Okay. As countersigner to the NDA and HR</p> <p>20 director for Donald J. Trump, would it be disparaging</p> <p>21 for someone to say they were sexually harassed at the</p> <p>22 campaign if true?</p> <p>23 MR. STONEROCK: Calls for a legal conclusion,</p> <p>24 incomplete hypothetical.</p> <p>25 Are you referring to Ms. Denson's claims</p>
<p style="text-align: right;">Page 82</p> <p>1 Q Was he at the campaign when you were at the</p> <p>2 campaign?</p> <p>3 A Yes.</p> <p>4 Q Have you been involved in any way, provided</p> <p>5 any affidavit or testimony about David Bossie or Corey</p> <p>6 Lewandowski and whether their books violated the NDA?</p> <p>7 MR. STONEROCK: Objection, calls for attorney</p> <p>8 work product and attorney-client communications,</p> <p>9 vague and ambiguous as to involved in any way.</p> <p>10 You can answer the question if you understand it.</p> <p>11 THE WITNESS: I was gone January of 2017.</p> <p>12 MR. PHILLIPS: Okay. Bear with me. The good</p> <p>13 thing about silence, it means I'm getting rid of a</p> <p>14 bunch of questions. So it may seem like dead</p> <p>15 time, but it's because I'm getting rid of things.</p> <p>16 BY MR. PHILLIPS:</p> <p>17 Q Did you work with an individual by the name</p> <p>18 of Cliff Sims on the campaign?</p> <p>19 A Cliff Sims. He was part of the campaign, but</p> <p>20 I never worked closely with this individual. I know</p> <p>21 the name. I'm not sure we even met in person.</p> <p>22 Q Okay. Were you involved in his NDA</p> <p>23 arbitration? Have you been involved with his similar</p> <p>24 case to Omarosa's?</p> <p>25 MR. STONEROCK: Calls for attorney-client</p>	<p style="text-align: right;">Page 84</p> <p>1 specifically, John?</p> <p>2 MR. PHILLIPS: No. I'm just referring -- I'm</p> <p>3 trying to figure out where the line is from the</p> <p>4 countersigner of the NDA and HR director.</p> <p>5 MR. STONEROCK: Yeah. Well, these are legal</p> <p>6 conclusions you're asking for that -- you know,</p> <p>7 these are determinations that are going to be made</p> <p>8 by the arbitrator, you know. Ms. Castellano's</p> <p>9 opinion, frankly, is not -- on the application of</p> <p>10 the NDA to specific hypotheticals which are</p> <p>11 incomplete is not relevant frankly.</p> <p>12 MR. PHILLIPS: Truthfully --</p> <p>13 MR. STONEROCK: If you want to ask her about</p> <p>14 her personal knowledge of which I think she's</p> <p>15 already said she wasn't involved in the Denson</p> <p>16 case, but on any number of subjects, go ahead.</p> <p>17 But when you're asking her to apply the agreement</p> <p>18 to hypotheticals, that's just -- that's a legal</p> <p>19 conclusion.</p> <p>20 BY MR. PHILLIPS:</p> <p>21 Q As countersigner to the agreement and HR</p> <p>22 director for the Trump campaign, would bringing</p> <p>23 truthful claims against the campaign that weren't</p> <p>24 favorable violate the NDA --</p> <p>25 MR. STONEROCK: Calls for speculation --</p>

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1 MR. PHILLIPS: -- as you understood it?

2 MR. STONEROCK: -- lack of foundation,

3 incomplete hypothetical. There are no claims

4 against the campaign in this case, so I'm not sure

5 the relevance of this question either.

6 BY MR. PHILLIPS:

7 Q You can answer.

8 A I'm a little confused by your question

9 because you're talking about an employee making a claim

10 of sexual harassment.

11 Q Yes.

12 A That would have to be brought to the

13 attention of someone.

14 Q What do you mean?

15 A Exactly what I said. How would I know about

16 a claim of sexual harassment unless it was brought to

17 me?

18 Q Okay. So could under -- as countersigner to

19 the NDA and HR director could somebody file a lawsuit

20 for that?

21 MR. STONEROCK: Objection, incomplete

22 hypothetical, calls for a legal conclusion.

23 You can answer to the extent that you have --

24 you understand the question and you have an

25 understanding of whether or not that can happen.

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1 THE WITNESS: Well, I think -- is it the

2 person being harassed or -- you know, I'm really

3 not sure where you're going with this question.

4 So if I signed an NDA and I was being sexually

5 harassed, I should go to my superior or the HR

6 person to make the claim to let them know what was

7 taking place.

8 BY MR. PHILLIPS:

9 Q And they don't do anything. Then what

10 happens? Can you go public?

11 MR. STONEROCK: Calls for speculation,

12 incomplete hypothetical, calls for a legal

13 conclusion, vague and ambiguous as to the term go

14 public.

15 BY MR. PHILLIPS:

16 Q Can you file a lawsuit?

17 MR. STONEROCK: John, you're asking for legal

18 conclusions based upon incomplete hypotheticals.

19 I'm going to instruct the witness not to answer.

20 If you have questions about her personal

21 knowledge, then I'm happy to let her answer those.

22 BY MR. PHILLIPS:

23 Q As the person who literally signed the

24 agreement, I'm just trying to understand still what

25 rights you on behalf, you as signer and the Trump

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1 campaign, with you as HR director were trying to

2 restrict, what rights were you trying to restrict. And

3 so I'm trying to understand whether sexual

4 harassment -- is it your -- do you have an

5 understanding whether sexual harassment is confidential

6 information under the agreement?

7 MR. STONEROCK: Objection, calls for a legal

8 conclusion, incomplete hypothetical, vague and

9 ambiguous, irrelevant. There are no claims for

10 sexual harassment in this case. I'm going to

11 instruct the witness not to answer.

12 BY MR. PHILLIPS:

13 Q Is disparagement -- if someone contends they

14 were sexually harassed, as countersigner to the

15 agreement, binder for the Trump campaign, HR director

16 for the Trump campaign, do you contend that somebody

17 couldn't say that they were sexually harassed because

18 that would violate the no disparagement clause?

19 MR. STONEROCK: Same objection. I'm going to

20 instruct the witness not to answer.

21 BY MR. PHILLIPS:

22 Q Have you ever had a conversation with

23 Melania Trump?

24 A No, I have not.

25 Q Do you know whether or not the Women for

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1 Trump tour was well-funded?

2 A I don't know about the funding. I wasn't

3 involved in that aspect of the campaign.

4 Q Do you know whether or not Omarosa's outreach

5 agenda was well-funded?

6 A I do not know. I know nothing about funding

7 of each and every aspect of the campaign.

8 Q Do you know whether -- were you privy to -- I

9 guess let me ask it this way: What level of campaign

10 meetings or what type of campaign meetings were you

11 privy to?

12 A There were a lot of meetings being held, but

13 I as the HR director was not really involved. I did

14 not attend any of the strategy meetings. If there was

15 something I needed to know about, Jeff DeWit informed

16 me. But as far as joining every meeting that was held,

17 I did not.

18 Q What did you do in your average day?

19 A Aside from wrangling a bunch of college

20 students, at any given point in time there were, you

21 know, onboardings, documentation. We had hourly paid

22 individuals. Those documents needed to be submitted to

23 me, had to confirm them, send them over, reviewed

24 résumés for other potential individuals to come

25 onboard, filled out NDAs, sent documentation over to

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1 the payroll company. Some individuals, you know, would
2 have missing checks, had to track down checks, had to
3 track down invoices. Some people thought that I had
4 the checkbook so I could just write out their payment.
5 You know, if they submitted an invoice, there was a
6 process involved there.

7 Q Do you know who currently is in your role?

8 A I do not.

9 Q What other contracts -- you were signatory
10 for the campaign on the NDAs. What other contracts
11 were you signatory?

12 MR. PHILLIPS: Lucia, don't give any
13 specifics with respect to, you know, individuals.
14 If you have general categories of contracts.

15 THE WITNESS: I -- contract? Potentially the
16 new hire forms.

17 BY MR. PHILLIPS:

18 Q Okay. Anything else you recall?

19 A No, not to my recollection.

20 MR. PHILLIPS: Mr. Gordon, obviously I've got
21 to probably ask the questions. But if you have
22 any questions, you want to send them to me? Or
23 you can ask me and I can repeat what you say.

24 MR. STONEROCK: John, I'm fine if he wants to
25 ask questions.

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1 don't remember -- what I'm going to ask you is who
2 signed your NDA, which again you kind of answered, you
3 don't remember, who trained you on the NDA, and
4 explained it to you. And was there a third component,
5 or just those two? Just those two.

6 So who signed your NDA and who explained to
7 you the ramifications of the NDA? Do you know either
8 one of those -- the answer to either one of those
9 questions?

10 MR. STONEROCK: I'm objecting to the extent
11 that she had attorney-client communications with
12 Michael Glassner about the NDA.

13 MR. PHILLIPS: Okay.

14 MR. STONEROCK: Other than that, she can
15 answer.

16 THE WITNESS: I do not know who signed it.
17 But it was not -- I did not sign my own.

18 BY MR. PHILLIPS:

19 Q Okay. Do you remember who kind of walked you
20 through it?

21 A No. I think I walked myself through it.

22 MR. PHILLIPS: Okay. And that's all I have.
23 Thank you for your time today.

24 THE WITNESS: Thank you. You're welcome.

25 MR. STONEROCK: John, what do you want to do

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1 MR. PHILLIPS: Okay. Fair enough.
2 MR. STONEROCK: We don't need to go through
3 that process.
4 MR. PHILLIPS: He might have gone to the
5 bathroom.
6 MR. STONEROCK: Seems like he's away from his
7 desk perhaps or working on something else.
8 MR. PHILLIPS: Well, let's do this, we've
9 done one more hour. I think we're done and done
10 early comparatively. So if you-all could just
11 give me about a five- or ten-minute-break. Even
12 after a break we're not going more than a couple
13 of minutes. So I think we're wrapping up. But if
14 we could just take a couple-minute break, it will
15 help us end sooner.

16 MR. STONEROCK: Sounds good.

17 MR. PHILLIPS: Thanks all.

18 COURT REPORTER: Okay. I'm pausing the
19 recording.

20 (Brief recess.)

21 BY MR. PHILLIPS:

22 Q Bear with me. There's essentially three
23 questions that I'm going to tell you in advance just
24 to -- where I'm distinguishing things. And the last
25 one I just asked, so I think I know the answer. You

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1 about the transcript?
2 MR. PHILLIPS: We're going to order. I mean,
3 the reading or waiving? She --
4 MR. STONEROCK: Yeah, I think -- I mean,
5 perhaps we can go off the record and talk about
6 this.

7 MR. PHILLIPS: Sure.

8 COURT REPORTER: I'll end the recording now.
9 (Witness excused.)

10 (The witness did not waive reading and signing
11 and the deposition was concluded at 12:13 p.m.)

12 - - -

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Exhibit D

1 AMERICAN ARBITRATION ASSOCIATION
2 NEW YORK, NEW YORK

3
4 DONALD J. TRUMP FOR PRESIDENT, INC.,
a Virginia not-for-profit corporation,

5 Claimant,

6 vs.

7 OMAROSA MANIGAULT NEWMAN,
8 an individual,
9 Respondent.

10
11 VIDEO-RECORDED DEPOSITION OF ALAN COBB
12 Taken on Behalf of the Respondent

13
14 DATE TAKEN: Tuesday, March 9, 2021
15 TIME: 10:23 a.m. - 11:44 a.m.
16 PLACE: By Videoconference

17 Examination of the witness taken remotely before:
18 Elizabeth M. Masters
19 Registered Professional Reporter

20
21
22 RILEY REPORTING & ASSOCIATES
23 1300 Riverplace Boulevard, Suite 610
24 Jacksonville, Florida 32207
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1 COURT REPORTER: Will all counsel please state
2 their name and agreement on the record that I may
3 swear in the witness remotely.
4 MR. PHILLIPS: John Philips for Omarosa
5 Manigault Newman, and, yes, we stipulate that you
6 can swear in the witness remotely.
7 MR. STONEROCK: And Ryan Stonerock on behalf
8 of claimant, and we agree as well.
9 ALAN COBB,
10 having been produced and first duly sworn as a witness, and
11 after having responded "I do" to the oath, testified as
12 follows:

13 DIRECT EXAMINATION

14 BY MR. PHILLIPS:

15 Q Good morning.

16 A Good morning. Sorry for the delay. That was
17 my problem on Eastern versus Central time.

18 Q No problem. Happens all the time. We've got
19 -- we've got the west coaster over there, too, that had
20 to get up even earlier. I appreciate y'all all
21 accommodating us.

22 Would you please state your full name for the
23 record.

24 A Alan Cobb.

25 Q Mr. Cobb, my name is John Phillips. I

Page 4

1 represent Omarosa Manigault Newman. Are you familiar
 2 with Omarosa?
 3 A Yeah.
 4 Q Okay. And this is the Alan Cobb that once
 5 worked for Donald J. Trump for President, Inc., I
 6 assume.
 7 A Correct.
 8 Q Yeah. So we have the right person.
 9 Have you -- when was the last time you had
 10 your deposition taken?
 11 A I honestly don't know if I ever have.
 12 Q Okay. Fair enough. So I'm going to give you
 13 just kind of our ground rules for purposes of today.
 14 This isn't a normal conversation because,
 15 obviously, you've sworn to tell the truth. And so
 16 unlike normal conversation, we've got to officially
 17 take turns. And we can short-circuit this in -- in,
 18 you know, layman's conversation where I kind of
 19 anticipate what you're saying, you anticipate what I'm
 20 saying. That's a big no-no in a deposition.
 21 Secondly, because you've sworn to tell the
 22 truth, if you're speculating, if you're guessing, let
 23 us know that you're not quite sure on those facts
 24 because we want to -- we want to be clear on the
 25 record. For that reason, uh-huhs and huh-uhs don't

1 and get through this.
 2 Where are you currently employed?
 3 A I'm employed as the president and CEO of the
 4 Kansas Chamber of Commerce.
 5 Q When were you last employed by Donald J. Trump
 6 for President, Inc.?
 7 A Well, technically, it was all contract.
 8 Q Okay.
 9 A But it would have gone through, basically, the
 10 day after the election, and that would have been
 11 potentially November 30th. I can't recall my exact
 12 contract. No, I was month to month, so probably the
 13 end of November.
 14 Q Okay.
 15 A November of '16.
 16 Q Let me -- let me go back. When did you first
 17 work for -- for Mr. Trump, Mr. Trump's family, Mr.
 18 Trump's campaign, Mr. Trump's administration, any of
 19 the above?
 20 A The contract with the campaign started March
 21 1, 2015.
 22 Q What were you contracted to do?
 23 A I was the --
 24 MR. STONEROCK: Vague as to -- vague as to
 25 time.

1 quite come out. We do -- we are -- you know, we are on
 2 video, and, you know, this is the universal sign for
 3 yes, and most people go uh-huh. But it's -- it's one
 4 of those little things that the judges, you know, shake
 5 their finger at. It's -- you know, we're not clear
 6 sometimes.
 7 And, finally, if you need to take a break for
 8 any reason let us know. This isn't going to be a big
 9 marathon day, I don't think. If you don't understand
 10 anything that -- that I've asked, you know, let me
 11 know. It's absolutely crucial that you understand
 12 because we're gonna assume you -- assume you did if you
 13 answer the questions. Are all that -- is all that
 14 fair?

15 A It is fair.
 16 Q Okay.
 17 A Understandable.
 18 Q Okay. And if you -- if -- like I said, if you
 19 need a break, if you need clarification, just let me
 20 know; otherwise, I'm just gonna get started and try to
 21 get done. Okay?
 22 A Okay.
 23 Q And don't worry about water. Take as much as
 24 you want, or coffee, or whatever. You know, don't --
 25 we're just gonna try to, you know, be comfortable

1 BY MR. PHILLIPS:
 2 Q On March 1, 2015, what were you contracted to
 3 do?
 4 A Essentially to help the campaign manager,
 5 Corey Lewandowski, in anything and everything he needed
 6 with the campaign.
 7 Q Okay. And when did -- when did that contract
 8 or, I guess, your final contract with all of the
 9 parties that I said, you know, Trump campaign, Trump
 10 administration, all of that, when was your final day
 11 working for Trump?
 12 MR. STONEROCK: Objection, compound.
 13 You can answer if you understand it, Alan.
 14 THE WITNESS: The -- the day -- technically
 15 the day after the campaign. And then I also served
 16 in the transition team, which technically would
 17 have been working for the -- I think, the federal
 18 government.
 19 BY MR. PHILLIPS:
 20 Q Right. Okay. Did you have any appointed or,
 21 I guess, nonappointed positions for the federal
 22 government thereafter?
 23 A I did not.
 24 Q Okay. At what point did -- do you know -- do
 25 you know -- have you reviewed the agreement that

1 Omarosa Manigault Newman signed?
 2 A I have.
 3 Q Okay. Did you sign a similar agreement with
 4 the -- with the campaign?
 5 A I did.
 6 MR. STONEROCK: Objection, relevance.
 7 You can answer, Alan.
 8 THE WITNESS: I did.
 9 BY MR. PHILLIPS:
 10 Q Okay. And there are going to be objections.
 11 And unless -- unless instructed not to answer, just --
 12 we're gonna -- you know, you went to law school. I
 13 believe the -- you know, lawyers are gonna make their
 14 objections. We're gonna try to move through. And if
 15 -- if we need those to be ruled on by an arbitrator or
 16 a judge, you know, we'll do that down the road.
 17 A I understand.
 18 Q Did you sign more than one of those
 19 agreements?
 20 A I do --
 21 MR. STONEROCK: Objection due to relevance.
 22 Alan, you can answer.
 23 THE WITNESS: I do not believe so. I think it
 24 was just one.
 25 BY MR. PHILLIPS:

1 A I did not.
 2 MR. STONEROCK: John, do you mean Omarosa's
 3 NDA?
 4 MR. PHILLIPS: Yes.
 5 MR. STONEROCK: Okay.
 6 THE WITNESS: No --
 7 BY MR. PHILLIPS:
 8 Q Okay.
 9 A -- I did not.
 10 Q Do you know where it came from?
 11 A I do not.
 12 Q Okay. There's -- what was your working
 13 relationship for the -- the Koch brothers, the Koch
 14 Industries? Tell me about that, please.
 15 MR. STONEROCK: Vague as to time.
 16 You can answer, Alan.
 17 THE WITNESS: I worked for Koch Industries at
 18 their headquarters in Wichita from 1996 to '99.
 19 Then with Americans for Prosperity, which is a
 20 private 5L1-C4, and Americans for Prosperity
 21 Foundation, which is a C3, which is assumed or
 22 reported as part of the Koch network, but there's,
 23 you know, lots of independent funders, that was
 24 from 2004 through, gosh, 2012. And then, in 2013
 25 and 2014 worked for the Freedom -- Freedom Partners

1 Q Okay. Do you know if it was the same one that
 2 Omarosa signed?
 3 A I do not.
 4 Q Okay.
 5 A Hang on. I'm gonna turn my email off because
 6 it's popping emails. And I should have done this
 7 before. I'm just closing everything here. It's
 8 distracting. And I'm sure I'll have 150 unread emails.
 9 Okay. Thanks.
 10 Q Give me a little bit of your -- of your
 11 educational background, if you will, please.
 12 A Undergraduate from Wichita State University,
 13 bachelor's in general studies, master's of government
 14 administration from the University of Pennsylvania, law
 15 degree from Washburn University School of Law.
 16 Q Have you ever been licensed as a lawyer?
 17 A I am currently licensed, and have been since
 18 1992.
 19 Q In what state? Kansas?
 20 A Kansas.
 21 Q Okay. Did you provide any, I guess, legal
 22 advice related to the subject NDA?
 23 A No.
 24 Q Okay. Did you provide any edits or -- any
 25 edits or revisions of the subject NDA?

1 Chamber of Commerce.
 2 BY MR. PHILLIPS:
 3 Q Okay. I believe it was Michael Cohen -- do
 4 you know who Michael Cohen is?
 5 A Yes, I know who he is.
 6 Q Okay. I believe it was Michael Cohen that
 7 indicated at some point that the subject NDA, the NDA
 8 that Omarosa signed and some others signed, was either
 9 adapted from or acquired from one of the Koch business
 10 entities. Do you know anything about that?
 11 MR. STONEROCK: Objection, lacks foundation,
 12 calls for speculation.
 13 You can answer, Alan, if you know.
 14 THE WITNESS: Never heard of that --
 15 BY MR. PHILLIPS:
 16 Q Okay.
 17 A -- speculation whatsoever.
 18 Q Okay. Fair enough.
 19 As we sit here today, do you know who -- who
 20 would have drafted the subject NDA?
 21 A I do not --
 22 MR. STONEROCK: Objection, it calls for
 23 attorney work product.
 24 You can answer, Alan.
 25 THE WITNESS: I do not know.

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1 BY MR. PHILLIPS:
 2 Q Okay. Once you've -- I guess once the
 3 campaign kicked off, Omarosa had some working capacity;
 4 is that a fair statement?
 5 A I'm not aware of any of her work with the
 6 campaign until July-August '16.
 7 Q Okay.
 8 A Well after I started.
 9 Q What's a surrogate?
 10 A That's someone who represents the campaign on,
 11 typically, television shows. I suppose it could be
 12 radio or podcast or, et cetera.
 13 Q Were surrogates of Donald J. Trump for
 14 President, also known as the campaign, compensated?
 15 A I do not know.
 16 MR. STONEROCK: Calls for speculation, lacks
 17 foundation, vague as to time.
 18 BY MR. PHILLIPS:
 19 Q Okay.
 20 MR. STONEROCK: Alan, you can answer.
 21 THE WITNESS: I have no idea.
 22 BY MR. PHILLIPS:
 23 Q Okay. What is your first understanding of --
 24 of when Omarosa was -- was brought in to do something
 25 for Donald J. Trump for President?

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1 A I only became aware of it sometime early July
 2 2016.
 3 Q Okay. And what was she brought in -- were you
 4 involved in recruiting her, bringing her aboard,
 5 anything like that?
 6 A No. So I don't know what she was doing prior
 7 to -- when I met her. And I don't recall what her role
 8 was or what she did.
 9 Q Okay. What was your first, I guess -- and I
 10 don't mean personal introduction, but what was your --
 11 I guess, as best as you can recall, what's your first
 12 understanding or recollection that Omarosa Manigault
 13 Newman was going to be affiliated in some way with the
 14 campaign or the campaign work?
 15 A Probably at the Republican convention when she
 16 told me that Paul Manafort had hired her, which, in
 17 fact, was not true.
 18 Q What did -- I mean, help me understand that.
 19 So -- so you ran into her at the RNC, and she indicated
 20 that Manafort had retained her. In what capacity?
 21 A In some capacity with coalitions,
 22 African-American outreach.
 23 Q Okay. And how did you determine that was
 24 untrue?
 25 A Rick Gates called me and made sure I knew that

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1 there was no truth to that whatsoever.
 2 Q Okay. Why is that significant?
 3 MR. STONEROCK: Objection, calls for
 4 speculation, lacks foundation, vague as to the term
 5 "significant," misstates his testimony.
 6 You -- you can answer, Alan.
 7 THE WITNESS: Can you -- can you repeat the
 8 question? I'm sorry.
 9 BY MR. PHILLIPS:
 10 Q Yes. Sure, sure.
 11 You know, I guess, of what significance is
 12 that -- was that to you at the time that there was this
 13 inconsistency about whether or not Omarosa was -- was
 14 retained or -- or brought aboard by Paul Manafort?
 15 MR. STONEROCK: Same objections.
 16 Go ahead, Alan.
 17 THE WITNESS: It exposed her dishonesty.
 18 BY MR. PHILLIPS:
 19 Q Okay. It -- so how did that lead to her
 20 actually being retained by the campaign?
 21 A As I'm recalling, she stayed in touch with me
 22 July, August, and I think it -- other folks, and just a
 23 decision was made to -- to bring her on in -- in -- in
 24 a capacity --
 25 Q Okay.

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1 A -- in a coalition thing.
 2 Q Gotcha.
 3 I'm gonna experiment with trying to bring up
 4 some documents here.
 5 MR. PHILLIPS: I've learned, Mr. Stonerock.
 6 Let's see.
 7 MR. STONEROCK: I appreciate that.
 8 BY MR. PHILLIPS:
 9 Q Alan Cobb email request, let's see what this
 10 is. Can you see a document on your screen?
 11 A I cannot. I don't think either of us --
 12 MR. STONEROCK: We can't see it, John.
 13 MR. PHILLIPS: Okay. Let me try this a
 14 different way.
 15 THE WITNESS: I can see something now.
 16 BY MR. PHILLIPS:
 17 Q Okay. Do you see an email?
 18 A Yes.
 19 Q Okay.
 20 MR. STONEROCK: John, can you expand that
 21 window?
 22 MR. PHILLIPS: Sure.
 23 MR. STONEROCK: I think that might -- yeah.
 24 MR. PHILLIPS: Is it better?
 25 MR. STONEROCK: Yeah.

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1 BY MR. PHILLIPS:
 2 Q And ignore the top part. That's just where it
 3 was forwarded to me.
 4 But do you recall an email of August 8, 2016
 5 to Omarosa Manigault where you indicated, "Can you
 6 please complete this ASAP. I thought this was already
 7 on file since you had done some surrogate work for the
 8 campaign?"
 9 A Yeah. Yeah. I mean, yeah, that's -- that's
 10 obviously my -- an email from me.
 11 Q Okay. And acobb@donaldtrump.com was your
 12 email address at the time?
 13 A Correct.
 14 Q Okay. And, again, as of August 8, what was
 15 your understanding of surrogates and NDAs? Were
 16 surrogates under NDAs?
 17 MR. STONEROCK: Objection, compound, calls for
 18 speculation, lacks foundation.
 19 You can answer if you understand it.
 20 BY MR. PHILLIPS:
 21 Q Were surrogates -- were surrogates under NDAs?
 22 A We -- we --
 23 MR. STONEROCK: Same objections.
 24 THE WITNESS: We had virtually -- as I recall,
 25 everybody signed NDAs, not just surrogates.

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1 BY MR. PHILLIPS:
 2 Q Okay. Are you aware of who -- you know, whose
 3 directive that was that everybody should be under an
 4 NDA?
 5 MR. STONEROCK: Objection, calls for
 6 attorney-client communication, calls for attorney
 7 work product.
 8 Mr. Cobb, you can answer if you know.
 9 THE WITNESS: I do not. My direction was from
 10 Corey Lewandowski, campaign manager --
 11 BY MR. PHILLIPS:
 12 Q Okay.
 13 A -- for -- for mine.
 14 MR. STONEROCK: John, are you gonna mark that
 15 as an exhibit?
 16 MR. PHILLIPS: Yeah, we will.
 17 MR. STONEROCK: Okay.
 18 MR. PHILLIPS: We'll mark the -- the first one
 19 as Defendant's Exhibit 1 to the deposition.
 20 (Respondent's Exhibit 1 was marked for
 21 identification.)
 22 This will be Defendant's Exhibit 2 to the
 23 deposition.
 24 (Respondent's Exhibit 2 was marked for
 25 identification.)

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1 And I will provide these to -- to Madam Court
 2 Reporter digitally shortly. They will also be on
 3 the video record.
 4 BY MR. PHILLIPS:
 5 Q This is a second email from Omarosa, again, to
 6 acobb@donaldtrump.com, dated August 24. It appears
 7 this is when she sent her signed agreement to you.
 8 Does that appear correct?
 9 A It appears correct.
 10 Q And what would you do with it once you
 11 received this?
 12 A As I'm recalling, I believe I would send those
 13 to Lucia.
 14 Q Okay. Castellano?
 15 A Correct. The HR director.
 16 Q Okay. What was your role with kind of
 17 collecting NDAs or -- or making sure they were -- they
 18 were accomplished? Why were you involved?
 19 MR. STONEROCK: Objection, calls for
 20 speculation, lacks foundation.
 21 You can answer, Alan.
 22 THE WITNESS: Just for the folks that I was
 23 dealing with; that was the only involvement I had.
 24 The folks on the campaign, whether it was the
 25 primary or post -- post convention.

Page 20

1 BY MR. PHILLIPS:
 2 Q Would you have been Omarosa's supervisor?
 3 A I don't know that Omarosa really had a
 4 supervisor. So I do -- in campaigns you don't really
 5 have HR reporting trees like you do in other
 6 organizations.
 7 Q Okay. Let's see here. Let me stop share and
 8 go back. Two, three.
 9 Let's try this one. I'm going to present what
 10 will be labeled defendant's third exhibit. Let me know
 11 when you can see it. Can you see it?
 12 A I cannot.
 13 Q Let me go back to Zoom and figure out why not.
 14 I might have too many windows open.
 15 A Okay, I can see that.
 16 Q Let me expand it for you.
 17 A Yeah, I can see it.
 18 Q Okay. It appears to be, you know,
 19 "Subject" -- again, this will be Defendant's 3. A
 20 message from you, "Subject: Paperwork!" And you say,
 21 "Thanks for being so patient with us!"
 22 And it appears this is the unsigned version,
 23 so this is where you forwarded it to Ms. Manigault
 24 Newman. Does that sound -- does that sound and look
 25 correct?

Page 21

1 A It sounds and looks correct.
 2 (Respondent's Exhibit 3 was marked for
 3 identification.)
 4 BY MR. PHILLIPS:
 5 Q Okay. What did you mean, "Thanks for being so
 6 patient with us"?
 7 A I tend to believe that sugar goes further than
 8 vinegar. And, frankly, she had been kind of aggressive
 9 on all of this. And we had some internal
 10 conversations, as I'm recalling, whether to even -- to
 11 bring her on in an official capacity.
 12 So trying to be nice, and we're gonna bring
 13 her on, let's set the stage so we're all acting
 14 professionally.
 15 Q Okay. Explain what you mean about -- about, I
 16 guess, concerns.
 17 A Oh, I --
 18 MR. STONEROCK: Objection, misstates his
 19 testimony.
 20 BY MR. PHILLIPS:
 21 Q Explain what you mean about the internal con-
 22 -- tell me about the internal conversations you were
 23 having.
 24 A How -- there were budget issues, there were --
 25 were issues and concerns that other folks who had dealt

Page 22

1 with Omarosa that expressed to me how good of a team
 2 player she would be, et cetera. Is she worth the
 3 trouble, frankly? And I had not, except for a
 4 couple -- and I actually knew exactly what they were
 5 talking about given my -- my interactions with her
 6 where she told me that Manafort had hired her when she
 7 [sic] had not.
 8 Q Okay. Had you met her at this point, by
 9 August 24?
 10 A I met her -- the first time I met her was
 11 in -- sometime early July at the RNC.
 12 Q Okay.
 13 A That's the first time I had met her.
 14 Q Had you met her -- had you -- had you been in
 15 her presence after that?
 16 A Just at the RNC, at the convention.
 17 Q Whose decision was it to bring Ms. Manigault
 18 Newman on board?
 19 MR. STONEROCK: Vague as to time, calls for
 20 speculation, lacks foundation.
 21 You can answer if you understand, Alan.
 22 THE WITNESS: As I'm recalling, just
 23 several -- several folks just decided, okay, we
 24 can -- she might be an asset to the campaign.
 25 Let's bring her on. I don't know that it was a

Page 23

1 single person who -- who did it.
 2 BY MR. PHILLIPS:
 3 Q Had she been doing surrogate work before
 4 August 24, 2016 for the campaign?
 5 A I don't know. One thing I was gonna mention,
 6 which I think is relevant, is, of course, there's lots
 7 of people that were Trump supporters out on television
 8 and radio that weren't necessarily affiliated with the
 9 campaign, and I don't know if that was what she was
 10 doing prior to our official engagement or not.
 11 Q And just to go back to the -- I guess the
 12 prior email. Nope. The one before that. And I
 13 thought you were on file -- the -- the August 8 email,
 14 "I thought this was already on file since you had done
 15 some surrogate work for the campaign."
 16 What was your basis of understanding, then,
 17 that she had done some surrogate work for the campaign?
 18 A As I'm recalling, I think some folks said she
 19 had been out on media talking because of her -- talking
 20 about Donald Trump because of her previous
 21 relationship.
 22 I would say that's probably kind of a
 23 euphemism. A surrogate can have -- have a -- can have
 24 a lot of different -- different -- different -- not a
 25 lot, but certainly a couple different interpretations.

Page 24

1 Q Okay. And then this will be, I believe,
 2 Defendant's 4, which is another email dated July 26
 3 from acobb@donaldtrump.com to Omarosa. And it's --
 4 it's a chain, so you probably need to go down to the
 5 bottom of the chain, which would be --
 6 MR. STONEROCK: John, will this be Exhibit 4?
 7 MR. PHILLIPS: Yes, Defendant's Exhibit 4.
 8 (Respondent's Exhibit 4 was marked for
 9 identification.)
 10 BY MR. PHILLIPS:
 11 Q -- from Omarosa to Alan Cobb. "Subject:
 12 Start Paper Work.
 13 "Can you let me know when I will get my NDA
 14 and paper work. Also can you give me an official date
 15 for my announcement. I want to get the statement from
 16 DJT for the statement.
 17 "Omarosa."
 18 Do you -- do you -- do you -- is this an email
 19 sent between you and Omarosa?
 20 A It appears to. I'm not -- I can't say I
 21 recall that specific email.
 22 Q Okay.
 23 A But, yes, that's obviously to me.
 24 Q And at least as of July 25th, does it seem
 25 that Omarosa was trying to get paperwork from you or

Page 25

1 the campaign?

2 A Yes. I think the relevance would be the date
3 of the RNC, and I just don't remember those dates, if
4 that coincides with that or not.

5 Q Okay. And then there appears to be a response
6 the same day: I inquired via email. I will be in New
7 York City tomorrow and can inquire. What are you
8 thinking as to timing? Next week? Or maybe have
9 something ready based upon what happens at the DNC?

10 Do you recall that email?

11 A I recall it because I'm looking at it. I --
12 obviously, it's been a while.

13 Q And then the next day Omarosa, I guess, back
14 to you, "Any update in my start paperwork? Did you
15 speak to Lucia?"

16 And then back to the last segment of this one,
17 "I haven't. My meetings all delayed. Will advise."

18 Do you remember anything about this email
19 chain?

20 A I don't remember. Maybe the subject, but not
21 the email chain specifically, what -- what are we gonna
22 do with Omarosa? What are we -- I would -- I had been
23 named coalition director and was trying to get some
24 direction from campaign hierarchy about how we're gonna
25 structure things.

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1 Q Okay. Who would you have been conferring
2 with? And you indicate, "I inquired via email,"
3 and I'll inquire in -- in -- in New York City. Who --
4 who would have been your source of contact on these
5 issues?

6 A As I recall, it would have been Rick Gates.

7 Q Okay. And what was Rick Gates's role at the
8 time?

9 A I don't know what his title was. He was kind
10 of Paul Manafort's right-hand man.

11 Q Okay. At what point was there a transition
12 between Manafort and Lewandowski?

13 A Well, Manafort was brought on in April to
14 manage the convention and do some of the delegate chase
15 stuff. Corey was let go June. I'm not gonna remember
16 the date. And I don't know if Manafort's title
17 changed, because his title was kind of chair or
18 something. And titles in campaigns don't mean a lot.

19 Q Right.

20 A So I -- but for practical purposes, it would
21 have been after Corey was let go in June.

22 Q Okay.

23 A And I don't remember if that was mid-June,
24 late June, early June. I just don't remember.

25 Q So by July, certainly, of 2016, Corey

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1 Lewandowski would not have been the campaign manager
2 for Donald J. Trump for President, Inc.?

3 A Correct.

4 Q Did you and Ms. Newman work on any projects
5 together?

6 A I'm recalling that we worked together on
7 Donald Trump's appearance -- I was trying to get the
8 right word -- appearance at an African-American church
9 in Detroit.

10 Q Okay.

11 A Which would have been Labor Day-ish or Labor
12 Day weekend.

13 Q Who was -- and -- and I've --

14 MR. STONEROCK: John -- John, I'm sorry to
15 interrupt you. Do you want him to take a look at
16 this email that you have on the screen?

17 MR. PHILLIPS: I was getting there.

18 MR. STONEROCK: Okay.

19 MR. PHILLIPS: We'll attach it as Plaintiff's
20 5 -- or Defendant's 5.

21 (Respondent's Exhibit 5 was marked for
22 identification.)

23 BY MR. PHILLIPS:

24 Q Who was -- and I have some questions about it.

25 Who was Laura Hilger?

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1 A I do not remember.

2 Q Okay. Who was Avrahm Berkowitz?

3 A As I'm recalling, he worked with Brad Parscale
4 on data -- data, voter data.

5 Q Okay. If -- I mean, it looks like from the
6 email -- on the beginning of this email it's s -- Laura
7 Hilger is identified at sclgroup.cc. Do you know what
8 that is?

9 A I do not.

10 Q And at the end, she's got two emails. One is
11 cambridgeanalytica.org and the other one is
12 sclgroup.cc. Do you know what Cambridge Analytica is?

13 A Yeah, it was a -- it's a data firm. That's
14 probably the extent of my knowledge.

15 Q Okay. And it appears -- let me -- it's a
16 six-page email. It appears that there's -- there's

17 some back -- back and forth about African-American

18 outreach and statistics involving, I guess, a
19 simultaneous email to you and Omarosa Manigault -- at

20 the time Manigault, now -- no Manigault Newman. Do you
21 recall this -- you know, this project, I guess?

22 A Kind of vaguely now that I see it. We were
23 simply looking in the battleground states in
24 African-American communities on normal campaign nuts
25 and bolts, out -- engagement outreach turnout,

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<p>1 and trying to figure out where the African -- the</p> <p>2 African-American community was in the presidential</p> <p>3 race.</p> <p>4 Q On this aspect of the campaign, did you have</p> <p>5 any concerns about Ms. Manigault Newman's honesty or</p> <p>6 integrity?</p> <p>7 A No.</p> <p>8 Q Can you identify any issue with the campaign</p> <p>9 other than the Paul Manafort comment where you found, I</p> <p>10 guess, any impropriety or dishonesty by Ms. Manigault</p> <p>11 Newman?</p> <p>12 A I think when she came on -- no.</p> <p>13 Q Okay.</p> <p>14 MR. STONEROCK: John, are you going to ask him</p> <p>15 more questions about this email? It's just -- it's</p> <p>16 a little difficult to focus when you're -- when</p> <p>17 you're scrolling through it, and I think --</p> <p>18 MR. PHILLIPS: Yeah, I don't -- it was just</p> <p>19 kind of a refresh the recollection, trying to</p> <p>20 understand who the players were involved.</p> <p>21 BY MR. PHILLIPS:</p> <p>22 Q I didn't get -- Mr. Cobb, I didn't get a lot</p> <p>23 of email produced to me by either my client or the</p> <p>24 campaign involving my client. Do you know how much, I</p> <p>25 guess, email traffic there would have been between you</p>	<p>1 BY MR. PHILLIPS:</p> <p>2 Q Okay. Do you know if the NDA Omarosa signed</p> <p>3 is -- is -- well, let me -- let me ask it this way.</p> <p>4 Did you have any discussions at the -- at -- at -- you</p> <p>5 know, while employed by the campaign about whether,</p> <p>6 essentially, the -- the NDA language, the nondisclosure</p> <p>7 language, is valid?</p> <p>8 MR. STONEROCK: Lacks foundation, calls for a</p> <p>9 legal conclusion.</p> <p>10 You can answer if you know.</p> <p>11 THE WITNESS: I did not.</p> <p>12 BY MR. PHILLIPS:</p> <p>13 Q I'm gonna play a three-minute clip of Corey</p> <p>14 Lewandowski talking about the -- the NDAs of the</p> <p>15 campaign and then after, and then I'll have some</p> <p>16 questions about it. So bear with me. And it's -- it's</p> <p>17 about three minutes.</p> <p>18 (Playing of video-recording as follows:)</p> <p>19 AP REPORTER: Corey, we've learned a lot in</p> <p>20 the last few days and weeks about nondisclosure</p> <p>21 agreements both from the -- on the Trump campaign</p> <p>22 and the White House and political organizations.</p> <p>23 So, first, could you say if you've signed a</p> <p>24 nondisclosure agreement with the president, number</p> <p>25 one; and then, number two, does the practice of</p>
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<p>1 and Omarosa during the few months she was involved with</p> <p>2 the campaign?</p> <p>3 A I don't think a whole lot.</p> <p>4 MR. STONEROCK: Speculation, lacks foundation.</p> <p>5 I also -- John, I hadn't seen that document</p> <p>6 produced before on -- from your end. I presume you</p> <p>7 got that from your client. We don't have -- I've</p> <p>8 never seen that document. It wasn't produced to</p> <p>9 us.</p> <p>10 MR. PHILLIPS: Well, it doesn't really involve</p> <p>11 the NDA and -- and all of that. I mean, I'm happy</p> <p>12 -- it's -- it's gonna be attached as -- as an</p> <p>13 exhibit here, and I'll send it to you.</p> <p>14 MR. STONEROCK: Understood.</p> <p>15 BY MR. PHILLIPS:</p> <p>16 Q Did you have any conversations with Corey</p> <p>17 Lewandowski about nondisclosure agreements related to</p> <p>18 the campaign?</p> <p>19 MR. STONEROCK: I'm sorry. I'm sorry. I</p> <p>20 didn't hear that. Nondisclosure agreements related</p> <p>21 to what, John?</p> <p>22 MR. PHILLIPS: The campaign.</p> <p>23 THE WITNESS: All I'm recalling is the folks</p> <p>24 that we got engaged in the various states that</p> <p>25 Corey was head, everybody signs an NDA.</p>	<p>1 having nondisclosure agreements by -- particularly</p> <p>2 for people who serve in the administration, but</p> <p>3 also on the campaign, undermine the credibility of</p> <p>4 people who serve on the president's behalf in that</p> <p>5 they are contractually prohibited from being</p> <p>6 critical of the president in many of these cases?</p> <p>7 MR. LEWANDOWSKI: So when I joined the</p> <p>8 campaign, which was January of 2015, I actually</p> <p>9 signed a nondisclosure agreement which was with a</p> <p>10 precursor to the campaign, just for legal reasons,</p> <p>11 because the campaign didn't even exist at the time.</p> <p>12 And as I think you all know, I wrote a book,</p> <p>13 and there was no pushback on the book. And I think</p> <p>14 my book was a very honest assessment of my time on</p> <p>15 the campaign trail, good, bad, or indifferent.</p> <p>16 And I -- I was never contacted by the Trump</p> <p>17 team or the Trump attorneys to say you can't write</p> <p>18 a book. You can't do any of these things. I was</p> <p>19 -- I was very honest. I didn't have to submit my</p> <p>20 book or a proposal or any of those things to them</p> <p>21 for their review or their consideration.</p> <p>22 As it relates to a nondisclosure agreement for</p> <p>23 government employees -- and I'm not an attorney,</p> <p>24 just to be clear -- I don't know if they're valid</p> <p>25 whatsoever. Other than the disclosing of</p>

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1 classified information -- which is a crime in and
2 of itself and has nothing to do with a
3 nondisclosure agreement -- I don't know how you
4 hold a public employee, a government employee,
5 accountable to a nondisclosure agreement. I don't
6 know if that's enforceable whatsoever. I have no
7 idea.

8 And -- and I think the issue is it has been a
9 long-term business practice of the Trump
10 administration -- of the Trump organization to have
11 nondisclosure agreements. And it's something that
12 they brought to the administration. I don't know
13 who signed them, I don't know who didn't sign them.
14 I've never seen one because I didn't work for the
15 government in any capacity there. But I don't know
16 if they're enforceable.

17 And what I think it is, is probably the
18 president wanting to bring a business executive
19 experience to the government. And that was one of
20 the things that he brought with him, which was this
21 is something that I did in the private sector, and
22 something I am wanting to implement in the
23 government sector. I just don't know if they're
24 enforceable.

25 AP REPORTER: And somebody who signed it and

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1 is prohibited under a nondisparagement clause from
2 saying anything critical of the president, doesn't
3 that impeach everything else that they say?

4 MR. LEWANDOWSKI: And I don't -- look, I don't
5 know how enforceable any of them are, to be honest
6 with you. Traditionally nondisclosure agreements
7 and noncompete agreements are so that you can't
8 steal business from one company and take it to
9 another company or you have proprietary information
10 as a -- as a business owner that would preclude you
11 from going to a competitor. I don't know how you
12 can stop somebody from saying something that they
13 want to say about somebody.

14 Once you leave the employment of that
15 individual, there are some rules that you've chosen
16 to sign onto when you started the employment. But
17 you do have the right to free speech. You have the
18 -- you do have the right to talk to people. You
19 have the right to publish a book if you want to or
20 -- or say what you want or -- or pen an article. I
21 don't know how you can stop that from happening.

22 And the recourse seems to be through
23 arbitration, is what it seems to be, because I
24 don't think it's a court issue. I think they go to
25 arbitration and try and find a monetary penalty

1 which that person would then be responsible for if
2 they were in breach of their nondisclosure
3 agreement.

4 I don't know if that's been successfully used
5 in the past, but we've now seen multiple
6 individuals who have either signed nondisclosure
7 agreements and broken them or completely
8 disregarded them, and so we'll see what the
9 enforcement mechanism is.

10 (End of playing of video-recording.)

11 BY MR. PHILLIPS:

12 Q Related to that conversation, is there
13 anything that that refreshes your recollection about
14 about any conversations you had with Corey Lewandowski
15 about the agreements, nondisclosure agreements,
16 nondisparagement agreements, related to the Trump campaign?

17 A It does not. I'm not recalling having any of
18 those conversations with Corey.

19 Q Okay.

20 MR. STONEROCK: John, do you know the date of
21 that clip?

22 MR. PHILLIPS: It's -- it's in our motion. I
23 can -- I can pull it for you. It is in our
24 original -- it's -- it's been cited throughout.
25 But I'll get it for you.

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1 BY MR. PHILLIPS:

2 Q Mr. Lewandowski talks about pushback. And he
3 said he wrote a book, and he's never had any of the
4 Trump lawyers, government lawyers, or -- or Trump, you
5 know, team Trump, come after him or say anything.
6 Is that your experience as well? Have you had
7 anybody try to enforce your NDA or nondisparagement
8 agreement?

9 MR. STONEROCK: Objection, relevance, calls
10 for speculation, lacks foundation, calls for a
11 legal conclusion, calls for attorney-client
12 privileged communications and attorney work
13 product.

14 You can answer, Mr. Cobb, if you know.

15 THE WITNESS: I haven't, but I haven't
16 violated it.

17 BY MR. PHILLIPS:

18 Q Okay. And given you indicate you haven't
19 violated it, what's your understanding of the
20 nondisparagement provision that you signed?

21 MR. STONEROCK: Objection, calls for a legal
22 conclusion.

23 If you want to ask him about the
24 nondisparagement provision in Ms. Manigault
25 Newman's agreement, go ahead. His agreement's not

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1 even in front of us. It has no relevance to this
 2 case. So I'm not sure where you're going with
 3 this, John.
 4 BY MR. PHILLIPS:
 5 Q Do you know whether your nondisparage
 6 agreement is different from the one Omarosa Manigault
 7 Newman signed?
 8 MR. STONEROCK: Objection, asked and answered.
 9 You can answer again.
 10 THE WITNESS: I do not. But I have no reason
 11 to believe it's different.
 12 BY MR. PHILLIPS:
 13 Q Okay. Assuming if -- if it will -- if you
 14 will, that it's the same, what is your understanding
 15 of -- of -- you know, Corey Lewandowski was talking
 16 about kind of trying to figure out where the line is
 17 and where it's enforceable. And I guess that's what
 18 I'm trying to understand. For somebody that actually
 19 presented this to Omarosa Manigault Newman to sign,
 20 what your understanding -- and as somebody who signed
 21 it themselves, what's your understanding of the
 22 nondisparage provisions that -- that -- that you were
 23 bound by and you were attempting to get her to be bound
 24 by?
 25 MR. STONEROCK: Objection, compound, calls for

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1 a legal conclusion.
 2 You can answer if you understand the question.
 3 THE WITNESS: Don't say bad stuff.
 4 BY MR. PHILLIPS:
 5 Q Okay. Does that include Donald Trump as
 6 president of the United States?
 7 MR. STONEROCK: Objection, incomplete
 8 hypothetical, calls for speculation, lacks
 9 foundation, calls for a legal conclusion, it's
 10 vague and ambiguous.
 11 You can answer if you understand the question.
 12 THE WITNESS: I would think it -- I think it
 13 would.
 14 BY MR. PHILLIPS:
 15 Q Okay. And there's also a term in there about
 16 confidential information. Are you familiar with that?
 17 A Generally.
 18 Q Okay. Have you been involved with any -- I
 19 guess were you personally involved in any corrections
 20 or reprimands of anybody or -- or seeking to enforce
 21 any of these terms where you individually, on behalf of
 22 the campaign, went to somebody and said: You know,
 23 you're getting close to the line here either in
 24 violating confidential information or nondisparage?
 25 MR. STONEROCK: Objection, calls for

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1 attorney-client communications and attorney work
 2 product privileged information.
 3 You can answer.
 4 THE WITNESS: No, not that I'm recalling.
 5 BY MR. PHILLIPS:
 6 Q Okay. How -- I mean, you said "Don't say bad
 7 stuff." You know, is it don't say bad stuff that's
 8 untruthful, or don't say bad stuff regardless about --
 9 about the people referenced in the agreement?
 10 MR. STONEROCK: Calls for a legal conclusion,
 11 incomplete hypothetical, lacks foundation.
 12 You can answer if you understand the question,
 13 Mr. Cobb.
 14 THE WITNESS: I think it's pretty clear don't
 15 say bad stuff, period.
 16 BY MR. PHILLIPS:
 17 Q Okay. Or what?
 18 MR. STONEROCK: Objection, incomplete
 19 hypothetical, calls for a legal conclusion, vague
 20 and -- vague and ambiguous, lacks foundation.
 21 You can answer it, Mr. Cobb, if you understand
 22 it.
 23 THE WITNESS: Then it causes a violation of
 24 the agreement.
 25 BY MR. PHILLIPS:

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1 Q Okay. As we sit here today -- and -- and,
 2 obviously, you haven't been with the campaign in a
 3 while, so I expect I know this answer -- but do you
 4 know how the campaign was damaged by Omarosa Manigault
 5 Newman?
 6 MR. STONEROCK: Calls for a legal conclusion,
 7 calls for attorney work product privileged
 8 information, calls for expert testimony, incomplete
 9 hypothetical.
 10 You can answer if you understand.
 11 THE WITNESS: I think some of her outrageous
 12 comments on some of the national TV shows certainly
 13 could be considered damaging.
 14 BY MR. PHILLIPS:
 15 Q Okay. Like what?
 16 A I don't have the transcript --
 17 MR. STONEROCK: Same objections.
 18 THE WITNESS: I don't have the transcript in
 19 front of me, but said, it seems to me, lots
 20 and lots on her book tour, lots and lots of --
 21 there's no other way to classify it -- negative
 22 things about Donald Trump. And I'm not recalling
 23 now about family, et cetera, but certainly Donald
 24 Trump.
 25 BY MR. PHILLIPS:

<p style="text-align: right;">Page 41</p> <p>1 Q Does it matter if those negative things are</p> <p>2 truthful or not?</p> <p>3 MR. STONEROCK: Calls for a legal conclusion,</p> <p>4 incomplete hypothetical, lacks foundation.</p> <p>5 You can answer it if you have an opinion, Mr.</p> <p>6 Cobb.</p> <p>7 THE WITNESS: In my opinion, no, it does not.</p> <p>8 BY MR. PHILLIPS:</p> <p>9 Q Have you given speeches?</p> <p>10 A I gave a lot of them.</p> <p>11 MR. STONEROCK: Objection, vague --</p> <p>12 MR. PHILLIPS: You're right, you're right.</p> <p>13 MR. STONEROCK: -- about speeches.</p> <p>14 MR. PHILLIPS: Of course he has.</p> <p>15 BY MR. PHILLIPS:</p> <p>16 Q Have you given speeches since leaving the</p> <p>17 Trump campaign about your time on the Trump campaign?</p> <p>18 A Not specifically. Because as the president of</p> <p>19 the chamber to talk about Kansas economy, et cetera,</p> <p>20 I'm almost always asked a question about it.</p> <p>21 Q Okay. Do you recall in a speech joking about</p> <p>22 whether or not Donald Trump could write his own</p> <p>23 speeches?</p> <p>24 A I do not recall anything like that.</p> <p>25 Q Okay. Did you write some of Donald Trump's</p>	<p style="text-align: right;">Page 43</p> <p>1 breach of the agreement you signed?</p> <p>2 MR. STONEROCK: Objection, misstates his</p> <p>3 testimony, calls for a legal conclusion, incomplete</p> <p>4 hypothetical, also irrelevant to this case.</p> <p>5 BY MR. PHILLIPS:</p> <p>6 Q You can answer.</p> <p>7 A Repeat the question.</p> <p>8 Q Yeah. I asked if you recalled giving a</p> <p>9 speech. You said you did. And I said: Do you recall</p> <p>10 giving anything negative, and you said you didn't. I</p> <p>11 said: If you did, would you have been in breach of the</p> <p>12 agreement?</p> <p>13 MR. STONEROCK: Objection, calls for a legal</p> <p>14 conclusion, incomplete hypothetical, totally</p> <p>15 irrelevant to this case.</p> <p>16 Mr. Cobb, you can answer if you understand.</p> <p>17 THE WITNESS: I don't -- yeah, I guess I'm not</p> <p>18 understanding the relevance.</p> <p>19 MR. PHILLIPS: Selective enforcement,</p> <p>20 selective enforcement is the relevance.</p> <p>21 BY MR. PHILLIPS:</p> <p>22 Q Isn't it -- isn't it true that Donald Trump</p> <p>23 commonly selectively enforces this agreement?</p> <p>24 A I --</p> <p>25 MR. STONEROCK: Objection, calls for</p>
<p style="text-align: right;">Page 42</p> <p>1 speeches?</p> <p>2 A The announcement speech, Corey and I</p> <p>3 and probably others --</p> <p>4 MR. STONEROCK: Objection.</p> <p>5 Hang on -- hang on one second.</p> <p>6 John, what's the relevance of this question?</p> <p>7 Because you're getting into confidential campaign</p> <p>8 issues that, in my view, frankly, have nothing to</p> <p>9 do with this case. And if you -- can you -- if you</p> <p>10 could articulate for me how this is relevant to --</p> <p>11 you know, to the case at all, then maybe I'll let</p> <p>12 him answer it; otherwise, I'm gonna have to, you</p> <p>13 know, instruct him not to answer it.</p> <p>14 MR. PHILLIPS: I mean, I've got a 45-minute</p> <p>15 clip I'm trying to -- to -- to not necessarily go</p> <p>16 through. Let's see.</p> <p>17 BY MR. PHILLIPS:</p> <p>18 Q Do you recall speaking -- let me find it here.</p> <p>19 Do you recall speaking before the Wichita Pachyderm</p> <p>20 Club?</p> <p>21 A I do.</p> <p>22 Q Okay. Do you recall saying anything negative</p> <p>23 about Donald Trump in that speech?</p> <p>24 A I do not.</p> <p>25 Q If you did, would you feel that you were in</p>	<p style="text-align: right;">Page 44</p> <p>1 speculation, lacks foundation, vague and ambiguous</p> <p>2 as to selectively enforce, incomplete hypothetical.</p> <p>3 You can answer if you understand, Alan.</p> <p>4 THE WITNESS: I have -- I have no idea.</p> <p>5 BY MR. PHILLIPS:</p> <p>6 Q Okay. Do you know of others where this</p> <p>7 agreement has been enforced? Have you -- have you been</p> <p>8 involved in any other cases?</p> <p>9 A I have not.</p> <p>10 Q Okay. Would it -- so let's take, for example,</p> <p>11 the -- the Access Hollywood incident. Donald Trump's</p> <p>12 walking around with Billy Bush. A recording is made</p> <p>13 where Donald Trump says: I don't even wait. And when</p> <p>14 you're a star, they let you do it. You can do</p> <p>15 anything. Grab them by the pussy. You can do</p> <p>16 anything. Excuse my language there.</p> <p>17 So is it your understanding under the</p> <p>18 agreement that somebody couldn't have a -- somebody who</p> <p>19 signed the agreement couldn't have that conversation,</p> <p>20 couldn't talk about that?</p> <p>21 MR. STONEROCK: Objection, calls for a legal</p> <p>22 conclusion, incomplete hypothetical, lacks</p> <p>23 foundation.</p> <p>24 You can answer if you understand the question,</p> <p>25 Mr. Cobb.</p>

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1 I think he's frozen.
 2 THE WITNESS: Ryan --
 3 MR. STONEROCK: Okay. You're back, Alan.
 4 Your video was --
 5 THE WITNESS: I'm sorry. I'm getting an
 6 Internet -- I'm getting an Internet connection
 7 unstable, which I'm showing I have plenty of
 8 strength on my home Wi-Fi.
 9 I think conversations are vastly different
 10 than being in a public forum of some kind.
 11 BY MR. PHILLIPS:
 12 Q Why so?
 13 MR. STONEROCK: Objection, calls for a legal
 14 conclusion, incomplete hypothetical.
 15 You can answer if you understand it, Alan.
 16 THE WITNESS: I don't -- it's very clear
 17 they're just different.
 18 BY MR. PHILLIPS:
 19 Q Are they different under the agreement?
 20 MR. STONEROCK: Objection, calls for a legal
 21 conclusion, incomplete hypothetical.
 22 You can answer if you understand.
 23 THE WITNESS: I'd have to have the agreement
 24 in front of me and look at each word, each -- each
 25 of the clauses of the agreement.

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1 BY MR. PHILLIPS:
 2 Q I'm wondering if I can enable you to scroll.
 3 Can you scroll? Probably not.
 4 A No.
 5 MR. STONEROCK: John, there -- there is a way
 6 you can do it.
 7 MR. PHILLIPS: I think I saw it when I
 8 started.
 9 MR. STONEROCK: So -- so, Alan, if you go
 10 under View Options at the top of your screen --
 11 THE WITNESS: Yes.
 12 MR. STONEROCK: -- and go down to Request
 13 Remote Control, I think if you do that it allows --
 14 it would allow --
 15 MR. PHILLIPS: Oh, I can do it. Give
 16 Mouse/Keyboard Control to Alan Cobb.
 17 MR. STONEROCK: Yeah, there you go.
 18 THE WITNESS: Oh, great, now my mouse is . . .
 19 BY MR. PHILLIPS:
 20 Q Let's see. Let me see if I can get back here.
 21 A It says I'm controlling your screen.
 22 Q And I'm trying to get back to Zoom so we're --
 23 let me stop share. Let me start over for a second.
 24 MR. STONEROCK: John, can we take a break for
 25 just two minutes?

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1 MR. PHILLIPS: Yeah. We've -- we've gone an
 2 hour. Let's -- let's take a -- just take five.
 3 MR. STONEROCK: Okay. Great.
 4 (Break from 11:16 a.m. to 11:24 a.m.)
 5 BY MR. PHILLIPS:
 6 Q Is there something allowing you control now,
 7 Mr. Cobb?
 8 A Oh, hang on. Okay. It says "Give Up Remote."
 9 Oh, yeah. So it's working.
 10 Q You've got my computer. So if you scroll
 11 down, this should be the Agreement. And then there's,
 12 as you get into, I believe, page 1 -- so go up -- page
 13 1 is disparagement, page 2 is confidential information.
 14 Let me ask this question. What was your
 15 understanding of what was -- what did the campaign -- I
 16 mean, were there any conversations you were a part of
 17 where the campaign defined or discussed what
 18 confidential information was sought to be protected by
 19 the subject agreement?
 20 MR. STONEROCK: Objection, calls for legal
 21 conclusion, calls for attorney-client
 22 communications and attorney-client work product
 23 information, the document speaks for itself.
 24 John, as you know, there is a definition of
 25 confidential information in the document.

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1 But, Alan, if you've had any conversations
 2 with nonlawyers about the meaning of confidential
 3 information, you can testify.
 4 THE WITNESS: I'm not recalling I had any of
 5 those conversations.
 6 BY MR. PHILLIPS:
 7 Q Okay. The same question as to the
 8 nondisparage language on page 2.
 9 A I'm not recalling that.
 10 MR. STONEROCK: Same objection.
 11 THE WITNESS: Yeah, I'm not recalling any
 12 conversations.
 13 BY MR. PHILLIPS:
 14 Q Okay. So where we were before the break was
 15 there's a topic at hand involving the president of the
 16 United States, and I -- we were trying to distinguish
 17 whether somebody who worked for the campaign could talk
 18 about it amongst their friends or to a national
 19 audience, and it -- you -- you indicated you -- you
 20 would like to review the agreement to determine your
 21 answer for that, I believe.
 22 A Yeah.
 23 MR. STONEROCK: Objection, it misstates his
 24 testimony, calls for a legal conclusion.
 25 I'm not sure I understand the question. But

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<p>1 you can answer it if you understand, Alan.</p> <p>2 THE WITNESS: I think there's something in</p> <p>3 here that talks about public disclosure or has a</p> <p>4 definition. But this -- the scrolling is a little</p> <p>5 clunky. And I would have to look at it whether</p> <p>6 it's on the confidential or disparagement or both.</p> <p>7 MR. STONEROCK: The disparagement provision,</p> <p>8 Alan, if you scroll up --</p> <p>9 THE WITNESS: Oh.</p> <p>10 MR. STONEROCK: -- it's paragraph 2, I</p> <p>11 believe.</p> <p>12 THE WITNESS: Okay. Gosh darn it, it's</p> <p>13 scrolling too fast.</p> <p>14 MR. STONEROCK: And I'm just gonna object.</p> <p>15 It, you know, calls for a legal conclusion, the</p> <p>16 document speaks for itself.</p> <p>17 But if you have an understanding, Alan, you</p> <p>18 can testify as to it.</p> <p>19 THE WITNESS: It does speak for itself, and it</p> <p>20 says "disparage publicly."</p> <p>21 BY MR. PHILLIPS:</p> <p>22 Q Were there any conversations you were involved</p> <p>23 as to what publicly meant with regard to this</p> <p>24 agreement?</p> <p>25 MR. STONEROCK: Objection, calls for</p>	<p>1 associate a question. The problem is we used the break</p> <p>2 for an actual bathroom break, so we didn't get a chance</p> <p>3 to chat.</p> <p>4 So, Mr. Cobb, is there anything -- so,</p> <p>5 obviously, I don't want to know, nor can I know -- you</p> <p>6 know this -- about any preparation that you had for</p> <p>7 this deposition. But what -- aside from that, what was</p> <p>8 your understanding -- or what is your understanding of</p> <p>9 your involvement in this matter, Donald J. Trump for</p> <p>10 President, Inc. versus Omarosa Manigault Newman?</p> <p>11 MR. STONEROCK: Calls for a legal conclusion,</p> <p>12 calls for speculation, lacks foundation, calls for</p> <p>13 attorney-client communications and attorney work</p> <p>14 product information.</p> <p>15 Mr. Cobb is a witness in the case. I'm not</p> <p>16 sure what you're getting at, John. Perhaps you</p> <p>17 could be a little bit more specific.</p> <p>18 MR. PHILLIPS: Certainly.</p> <p>19 BY MR. PHILLIPS:</p> <p>20 Q Well, let me back up this way. Do you -- do</p> <p>21 you expect -- if there's a trial of this matter, do you</p> <p>22 expect to testify?</p> <p>23 MR. STONEROCK: Same objections.</p> <p>24 You can answer if you -- if you have any</p> <p>25 expectation, Mr. Cobb.</p>
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<p>1 attorney-client privileged communication and work</p> <p>2 product, attorney work product, information.</p> <p>3 To the extent, Alan, you've had any</p> <p>4 conversations with nonattorneys, you can answer it.</p> <p>5 THE WITNESS: I'm not recalling any of those</p> <p>6 conversations.</p> <p>7 BY MR. PHILLIPS:</p> <p>8 Q Okay. Did you do any -- did you have any</p> <p>9 discussions with Omarosa Manigault Newman about this</p> <p>10 agreement other than: Hey, we need it signed. Here it</p> <p>11 is. Sign it?</p> <p>12 A Not that I'm recalling.</p> <p>13 Q Did you give any training to anyone at the</p> <p>14 campaign about this agreement?</p> <p>15 MR. STONEROCK: Objection, vague and ambiguous</p> <p>16 as to the term "training."</p> <p>17 You can answer.</p> <p>18 THE WITNESS: There was no training. Again,</p> <p>19 the words are pretty clear what it means.</p> <p>20 BY MR. PHILLIPS:</p> <p>21 Q Okay. I'm gonna sever your -- your ability to</p> <p>22 control my laptop.</p> <p>23 A Okay.</p> <p>24 Q Nothing personal. We're just done with that.</p> <p>25 Bear with me one second and let me ask my</p>	<p>1 THE WITNESS: I have put zero thought into</p> <p>2 that.</p> <p>3 BY MR. PHILLIPS:</p> <p>4 Q Okay. And I guess you -- you were listed as a</p> <p>5 witness for the plaintiffs, and, you know, with that</p> <p>6 there was no indicated testimony. And what I'm trying</p> <p>7 to understand is, is there anything that -- that you --</p> <p>8 you believe you can contribute to defendant's</p> <p>9 understanding of why you were on a witness list as we</p> <p>10 sit here today?</p> <p>11 MR. STONEROCK: Objection, calls for a legal</p> <p>12 conclusion, calls for attorney-client</p> <p>13 communications, calls for attorney work product</p> <p>14 information, calls for speculation, lacks</p> <p>15 foundation.</p> <p>16 You can answer if you have an understanding,</p> <p>17 Mr. Cobb.</p> <p>18 THE WITNESS: Because I was the one who</p> <p>19 facilitated the signing of the NDA.</p> <p>20 BY MR. PHILLIPS:</p> <p>21 Q Okay. What do you mean by that?</p> <p>22 A Well, I think it means what it means. Just</p> <p>23 the email -- the -- the email correspondence you've</p> <p>24 already seen, and I was the one who sent it to her</p> <p>25 and was the one communicating with her that she needs</p>

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1 to get this signed.

2 Q Okay. Do you know if she was compensated at
3 all by the campaign prior to signing the agreement?

4 A I do not, no.

5 Q Bear with me. I'm wrapping up. So I'm just
6 trying to skip over some stuff so we can all go about
7 our days.

8 Let me go quickly scan one more email to
9 myself, and it will be my last five minutes.

10 A Okay.

11 Q I'll be right back.

12 MR. STONEROCK: We'll come back in, what,
13 three minutes, John?

14 MR. PHILLIPS: Sounds good.

15 MR. STONEROCK: Okay.

16 (Break from 11:34 a.m. to 11:38 a.m.)

17 BY MR. PHILLIPS:

18 Q Let me go through one more email, which, I
19 think, will be Defendant's 6.

20 MR. STONEROCK: I think it's 7, John --

21 MR. PHILLIPS: 7.

22 MR. STONEROCK: -- because the Lewandowski clip
23 will be 6.

24 MR. PHILLIPS: That's right. That's right.

25 (Respondent's Exhibits 6 and 7 were marked for

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1 identification.)

2 BY MR. PHILLIPS:

3 Q Can you see it?

4 A Yes.

5 Q And I'm -- I'm gonna go -- let's see. August
6 5, July 28. I'm gonna start at the bottom. And just
7 let me know if you need any context. Some of this
8 doesn't involve you, which is why I didn't have it
9 scanned in. But you -- you -- you have become involved
10 at some point. So --

11 A Sure.

12 Q -- there's an email which we'll attach as
13 Defendant's 7, on Monday, July 18, where it appears
14 Omarosa wrote, "Hi, Lucia, Lucia I am sending the info
15 you requested and I am cc'ing Alan Cobb on all emails."
16 He is the contact for this, not Paul's office. Sorry
17 for any confusion.

18 "Also I understand about the urgency of the
19 NDA.

20 "Here is my address."

21 Again, on July 18 -- I guess, do you remember
22 this email? Do you have an independent recollection?

23 A I do not.

24 Q Does this refresh your recollection about any
25 of the material facts therein?

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1 MR. STONEROCK: Objection, lacks foundation,
2 vague as to material facts therein.

3 You can answer if you understand, Mr. Cobb.

4 THE WITNESS: That one particular email that's
5 on the screen doesn't refresh my memory in any way.

6 BY MR. PHILLIPS:

7 Q Okay. Then we move from July 18 to July 28.

8 Who was Jason Miller at the time? What was his
9 capacity?

10 A Some spokesperson of some kind officially on
11 the campaign.

12 Q Okay. And it appears Miller wrote --

13 Mr. Miller wrote Omarosa, "Want to talk about
14 formalizing your role."

15 And then it's a communication between Omarosa
16 and Jason Miller: Did you get my call? Before I am
17 headed to the RNC event wanted to reach out. Didn't
18 want to miss your call. Can you talk now?

19 And then Mr. Miller responds back to Omarosa:
20 I'm about 15 minutes from being able to call.
21 Finishing with DJT -- finishing with DJT before he has
22 to leave.

23 And then we go to August 5 from Omarosa to
24 Paul Manafort: Morning, Paul, I had a productive
25 conversation with Jason last week. I am writing to see

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1 who will be processing my paperwork. I was originally
2 connected with Lucia to do my NDA and other paperwork
3 (see below email). Not sure who the new HR person is
4 now. Can you please let me know -- or can you -- can
5 you please let me connect -- can you please let me
6 connect me to the proper person. Omarosa.

7 I guess the -- the -- the reason that I bring
8 this is there is some interplay apparently before the
9 campaign involving Paul Manafort. Do you have an -- do
10 you have any knowledge of whether Ms. Manigault Newman
11 had a conversation with Mr. Manafort about her
12 involvement with the campaign before the RNC?

13 MR. STONEROCK: Objection, calls for
14 speculation, lacks foundation.

15 You can answer if you know, Mr. Cobb.

16 THE WITNESS: I'm not aware of any such
17 conversation.

18 BY MR. PHILLIPS:

19 Q Okay. Do you know whether it did or it didn't
20 happen?

21 A I do not.

22 Q Who maintains -- did you maintain your email
23 from your time at the campaign?

24 MR. STONEROCK: Objection, vague as to time,
25 and also vague and ambiguous as to maintain.

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1 You can answer, Mr. Cobb, if you know.
 2 THE WITNESS: I did not.
 3 BY MR. PHILLIPS:
 4 Q Okay. Do you know if the campaign has the
 5 emails you sent and received while employed by the
 6 campaign or contracted by the campaign?
 7 MR. STONEROCK: Calls for speculation, lacks
 8 foundation.
 9 You can answer, Mr. Cobb.
 10 THE WITNESS: I do not know.
 11 MR. PHILLIPS: That's all I have. Thank you
 12 for your time today.
 13 THE WITNESS: Thank you.
 14 MR. STONEROCK: John?
 15 MR. PHILLIPS: Yeah.
 16 MR. STONEROCK: Could we go off the record for
 17 a minute?
 18 MR. PHILLIPS: Sure.
 19 MR. STONEROCK: And, Beth, we are going to
 20 order a copy of the transcript and, also, a copy of
 21 the video.
 22 (Off-the-record discussion.)
 23 (Witness excused.)
 24 (The deposition was concluded at 11:44 a.m.)
 25 - - -

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C E R T I F I C A T E

1 STATE OF FLORIDA)
 2)
 3 COUNTY OF DUVAL)
 4 I, ELIZABETH M. MASTERS, RPR, Notary Public,
 5 State of Florida at Large, certify that I was authorized to
 6 and did remotely stenographically report the video-recorded
 7 deposition of ALAN COBB; that a review of the transcript
 8 was requested; and that the transcript is a true and
 9 complete record of my stenographic notes.
 10 I further certify that I am not a relative,
 11 employee, attorney or counsel of any of the parties, nor am
 12 I a relative or employee of any of the parties' attorney or
 13 counsel connected with the action, nor am I financially
 14 interested in the action.
 15 Dated this 28th day of March 2021.
 16
 17
 18 /s/ Elizabeth M. Masters
 19 ELIZABETH M. MASTERS, RPR
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C E R T I F I C A T E O F O A T H

1 STATE OF FLORIDA
 2)
 3 COUNTY OF DUVAL)
 4
 5 I, ELIZABETH M. MASTERS, hereby certify that the
 6 witness named herein appeared remotely before me on March
 7 9, 2021, produced a Kansas Driver's License as
 8 identification, and was duly sworn.
 9 DATED this 28th day of March 2021.
 10
 11
 12 /s/ Elizabeth M. Masters
 13 ELIZABETH M. Masters, RPR
 14 Notary Public - State of Florida
 15 My Commission No. GG 987462
 16 Expires: June 4, 2024 Riley Reporting & Associates, Inc.
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E R R A T A S H E E T

1 DO NOT WRITE ON TRANSCRIPT - ENTER CHANGES BELOW
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 3 IN RE: DONALD J. TRUMP FOR PRESIDENT, INC. v. OMAROSA
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6 March 28, 2021
7 RYAN STONEROCK, ESQUIRE
8 Harder LLP
9 260 Madison Avenue, Sixteenth Floor
10 New York, New York 10016
11 RE: Donald J. Trump for President, Inc. vs. Omarosa
12 Manigault Newman
13 Deposition of: Alan Cobb

14 Dear Mr. Stonerock:

15 This letter is to notify you that the transcript of Mr.
16 Cobb's deposition that was taken on March 9, 2021 is now
17 ready for his review.

18 Please have Mr. Cobb read your copy of his deposition
19 transcript that was emailed to you. Upon execution of the
20 attached Errata Sheet, if you would please provide a copy
21 to Mr. Phillips.
22 Thank you for your assistance.

23 Sincerely,

24 /s/ Elizabeth M. Masters

25 Elizabeth M. Masters, RPR

cc: John M. Phillips, Esquire
jmp@floridajustice.com
erica@floridajustice.com

Riley Reporting & Associates, Inc.

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Exhibit E

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3		3	
4	DONALD J. TRUMP FOR PRESIDENT, INC., a Virginia not-for-profit corporation,		Direct Examination by Mr. Phillips 6
5	Claimant,	4	
6	vs.	5	Certificate of Oath 230
7	OMAROSA MANIGAULT NEWMAN,	6	Certificate of Reporter 231
8	an individual,	7	Errata Sheet 232
9	Respondent.	8	Errata Letter 233
10		9	
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12	VIDEO-RECORDED DEPOSITION OF SEAN RAY DOLLMAN	11	
13	Taken on Behalf of the Respondent	12	
14		13	
15	DATE TAKEN: Wednesday, March 31, 2021	14	
16	TIME: 10:02 a.m. - 3:30 p.m.	15	
17	PLACE: By Videoconference	16	
18		17	
19	Examination of the witness taken remotely before:	18	
20	Elizabeth M. Masters	19	
21	Registered Professional Reporter	20	
22		21	
23	RILEY REPORTING & ASSOCIATES	22	
24	1300 Riverplace Boulevard, Suite 610	23	
25	Jacksonville, Florida 32207 (904) 358-1615 info@rileyreporting.com	24	
		25	
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2		2	No. Description Page
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1 No. Description Page		1 Q Okay. That's essentially how a deposition goes. Have you ever had your deposition taken before?	
3 19 Campaign Ad 116		3 A No, sir.	
4 19A Video Clip 119		4 Q Okay. So I kind of want -- I -- I sometimes	
5 19B Video Clip 121		5 do a few test questions to kind of go back and explain	
6 19C Video Clip 125		6 that's perfect or that's not perfect.	
7 19D Video Clip 131		7 It's a question and answer session. Obviously	
8 19E Video Clip 133		8 you've -- you've sworn to tell the truth, so that's --	
9 19F Video Clip 136		9 that's of utmost importance. But you can't tell the	
10 20 Campaign Ad 144		10 truth if I'm cutting you off or if I'm not allowing you	
11 21 Campaign Ad 150		11 to answer your full question -- your full answer.	
12 21B Companion Agreement 158		12 The same thing with my questions. If you	
13 21C Consulting Agreement 159		13 don't hear my full questions, we're gonna have	
14 22 Campaign Ad 164		14 difficulty, not only with -- with Miss Beth typing this	
15 23 Campaign Ad 167		15 thing out, but with understanding the -- the	
16 24 Campaign Ad 171		16 question-answer session and the oath that's underlying	
17 25 Expert Witness Report 184		17 that. So it's absolutely my responsibility to ask you	
18 26 Legal Action Tweet 216		18 questions you understand. If you don't understand,	
19		19 please let me know.	
20 - - -		20 It's unlike a normal conversation in that we	
21		21 -- we kind of -- in a normal conversation, sometimes	
22		22 people short-circuit each other. They can kind of fast	
23		23 forward a conversation because you see where they're	
24		24 going. We can't do that here. We've got to take turns	
25		25 and -- and, you know, ask questions and answers -- have	
COURT REPORTER: Will all counsel please state their name and agreement on the record that I may swear in the witness remotely.	Page 6		Page 8
1		1 questions and answers.	
2		2 If you need to take a break for any reason,	
3		3 feel free, let me know.	
4		4 Your attorney may object. We would prefer if	
5		5 he -- he just states "object to form," meaning that	
6		6 there was a problem with the form of my question in his	
7		7 view. Unless he's instructing you not to answer, that	
8		8 is an objection for the record. You kind of pay it no	
9		9 mind. And we're preserving a record here, too.	
10		10 And just answer to the best of your ability. If he	
11		11 instructs you not to answer, we'll have a conversation	
12		12 about why that is and -- and go from there.	
13		13 Any questions as of right now about the -- the	
14		14 rules of a deposition?	
15		15 A No, sir.	
16		16 Q Okay. So what did you say your role was with	
17		17 the campaign?	
18		18 MR. STONEROCK: Vague as to time.	
19		19 BY MR. PHILLIPS:	
20		20 Q What is your role with the campaign currently?	
21		21 A Chief financial officer.	
22		22 MR. PHILLIPS: Mr. Stonerock, please just say	
23		23 "object to form" and not -- let's try to avoid	
24		24 speaking objections today.	
25		25 MR. STONEROCK: I'm gonna object how I'm gonna	

<p style="text-align: right;">Page 9</p> <p>1 object, and -- and I don't know what else to tell</p> <p>2 you.</p> <p>3 MR. PHILLIPS: Okay. Professionalism matters,</p> <p>4 sir.</p> <p>5 BY MR. PHILLIPS:</p> <p>6 Q So chief financial officer.</p> <p>7 MR. STONEROCK: You could learn something.</p> <p>8 BY MR. PHILLIPS:</p> <p>9 Q What is a chief financial officer?</p> <p>10 A Say it again.</p> <p>11 Q What does -- what does the chief financial</p> <p>12 officer for Donald J. Trump for President do?</p> <p>13 A Pretty much manages all the money on the</p> <p>14 campaign. So anything coming in we record it,</p> <p>15 and anything going out we record it.</p> <p>16 Q Okay. What other roles have you had with the</p> <p>17 campaign?</p> <p>18 A Deputy operations officer.</p> <p>19 Q What is a deputy operations officer?</p> <p>20 A Deputy director of operations -- that's what</p> <p>21 it was -- and then director of operations.</p> <p>22 Q Okay. Anything else?</p> <p>23 A No, sir.</p> <p>24 Q At some point were you the director of</p> <p>25 operations?</p>	<p style="text-align: right;">Page 11</p> <p>1 operations?</p> <p>2 A Jeff DeWit.</p> <p>3 Q Okay. What were your roles and</p> <p>4 responsibilities as the -- as the director of</p> <p>5 operations at the campaign?</p> <p>6 A Pretty much the same thing. There was a</p> <p>7 limited amount of people in 2017 through 2020, the</p> <p>8 beginning of 2020. So I reviewed contracts, managed</p> <p>9 and approved a lot of the expenses that went out.</p> <p>10 And then because it was so limited, just managing</p> <p>11 schedules and stuff.</p> <p>12 Q What does the campaign do when, I guess -- I</p> <p>13 mean, obviously I understand what a political campaign</p> <p>14 is to some extent. I've never run one. But help me</p> <p>15 understand what a campaign does after an election.</p> <p>16 MR. STONEROCK: Objection, incomplete</p> <p>17 hypothetical, vague and ambiguous, calls for</p> <p>18 speculation.</p> <p>19 What election are you talking about, John?</p> <p>20 BY MR. PHILLIPS:</p> <p>21 Q Did you understand my question, Mr. Dollman?</p> <p>22 A I believe so.</p> <p>23 Q Okay. Then you can answer it.</p> <p>24 A So if -- after an election -- right --</p> <p>25 normally a campaign would run into the RNC or the DNC,</p>
<p style="text-align: right;">Page 10</p> <p>1 A Yes, sir.</p> <p>2 Q When was that?</p> <p>3 A Roughly 2017 to the beginning of 2020.</p> <p>4 Q And then you became CFO; is that fair?</p> <p>5 A Yes, sir.</p> <p>6 Q Okay. And I assume -- and you know what</p> <p>7 happens when we assume -- but I assume you were the</p> <p>8 deputy director of operations before you were the</p> <p>9 director of operations; is that correct?</p> <p>10 A That is correct.</p> <p>11 Q Okay. So sometime up until 2017.</p> <p>12 When did you -- when did you become deputy</p> <p>13 director of operations?</p> <p>14 A I believe it was July of 2016.</p> <p>15 Q What is the -- what were your duties</p> <p>16 and responsibilities as the deputy director of</p> <p>17 operations for Donald J. Trump for President, Inc.?</p> <p>18 A Managing contracts that were coming in and out</p> <p>19 of the campaign. Just making sure and reviewing them</p> <p>20 before the director of operations reviewed them or the</p> <p>21 treasurer. And then, also, a lot of the inflow</p> <p>22 and outflow. So invoices that came to the campaign, I</p> <p>23 would review them before they were paid.</p> <p>24 Q Okay. Who was the director of operations at</p> <p>25 the campaign while you were the deputy director of</p>	<p style="text-align: right;">Page 12</p> <p>1 if it was a Democrat, so we would -- we discontinued</p> <p>2 fundraising as an entity, and then helping support</p> <p>3 other candidates that were also aligned with the</p> <p>4 president.</p> <p>5 Q Okay. Why would staffing -- I think I know</p> <p>6 the answer. But why would staffing shrink after an</p> <p>7 election?</p> <p>8 A There's less going on -- right -- so we're not</p> <p>9 buying as many ads, we're not running a lot of rallies</p> <p>10 or events.</p> <p>11 Q Why is Donald J. Trump for President, Inc.</p> <p>12 still, I guess, a viable political campaign? Why is it</p> <p>13 still going?</p> <p>14 MR. STONEROCK: Calls for speculation,</p> <p>15 incomplete hypothetical, irrelevant.</p> <p>16 You can answer if you know, Sean.</p> <p>17 THE WITNESS: Well, it will actually -- every</p> <p>18 campaign does this. Right? So after an election</p> <p>19 there's still FEC compliance, there's still a</p> <p>20 wind-down period of a campaign. So as the campaign</p> <p>21 you still have the responsibility to the donors</p> <p>22 and then, also, to the -- the FEC to make sure that</p> <p>23 everything's recorded properly and then the</p> <p>24 wind-down. It's just normal -- normal business</p> <p>25 process.</p>

<p style="text-align: right;">Page 13</p> <p>1 BY MR. PHILLIPS:</p> <p>2 Q Do you know as we sit here today whether, I</p> <p>3 guess, Donald J. Trump for President, Inc. is going to</p> <p>4 continue to exist with, I guess, another presidential</p> <p>5 candidacy by Donald Trump in -- in mind or in effort?</p> <p>6 MR. STONEROCK: Objection. It's totally</p> <p>7 irrelevant. I'm gonna instruct the witness not to</p> <p>8 answer.</p> <p>9 BY MR. PHILLIPS:</p> <p>10 Q Do you know if there's any current intent to</p> <p>11 wind down, as you put it, the campaign?</p> <p>12 MR. STONEROCK: Same objection.</p> <p>13 BY MR. PHILLIPS:</p> <p>14 Q There is?</p> <p>15 A Say it again. What are you asking?</p> <p>16 Q Yes. You discussed the winding down of the</p> <p>17 campaign. And what I'm trying to understand is, you</p> <p>18 know, at what -- at what part of a sunset or not, you</p> <p>19 know, I guess -- let me reask that.</p> <p>20 You know, where do we -- where do you sit as</p> <p>21 CFO with the future of Donald J. Trump for President,</p> <p>22 Inc. as a campaign?</p> <p>23 MR. STONEROCK: Objection, vague</p> <p>24 and ambiguous, not reasonably calculated to lead to</p> <p>25 discoverable evidence.</p>	<p style="text-align: right;">Page 15</p> <p>1 A No, sir.</p> <p>2 Q Okay. So you are not a lawyer. You have had</p> <p>3 no legal training; is that fair?</p> <p>4 A That's a hundred percent accurate.</p> <p>5 Q Okay. Do you have any other -- currently, do</p> <p>6 you have any other roles or -- do you have any other</p> <p>7 jobs?</p> <p>8 A Currently?</p> <p>9 Q Yes.</p> <p>10 A Yes, I do.</p> <p>11 Q What is that?</p> <p>12 A So I run a company that is also winding down</p> <p>13 but ran the media for the campaign, media purchasing.</p> <p>14 Q What do you mean "also winding down"?</p> <p>15 A We're also closing out the entity because the</p> <p>16 campaign is no longer around or actually doing</p> <p>17 business.</p> <p>18 Q Is that American Made Media Holding?</p> <p>19 A Yes, sir.</p> <p>20 Q What does American Made Media Holding do?</p> <p>21 A So it runs the -- it organizes all the</p> <p>22 subcontractors to purchase media for the campaign.</p> <p>23 Q Okay. And what is your current role with</p> <p>24 American Made Media Holding?</p> <p>25 A The owner.</p>
<p style="text-align: right;">Page 14</p> <p>1 John, what's the relevance of this to the case</p> <p>2 at all?</p> <p>3 BY MR. PHILLIPS:</p> <p>4 Q Do you understand my question?</p> <p>5 A Are you asking myself that?</p> <p>6 Q Yes.</p> <p>7 A No, I do not.</p> <p>8 Q Okay. Do you know if there's a timeline</p> <p>9 currently to wind down or close out Donald J. Trump for</p> <p>10 President, Inc.?</p> <p>11 MR. STONEROCK: Objection, same -- same</p> <p>12 objections. I'm gonna instruct the witness not to</p> <p>13 answer.</p> <p>14 BY MR. PHILLIPS:</p> <p>15 Q Are you accepting the advice of counsel to not</p> <p>16 answer that question?</p> <p>17 A Yes, sir.</p> <p>18 Q Okay. What's your educational background, Mr.</p> <p>19 Dollman?</p> <p>20 A I have three degrees, in management, finance,</p> <p>21 and then a minor in marketing.</p> <p>22 Q Where from, and when?</p> <p>23 A Northern Arizona University, and December</p> <p>24 2012.</p> <p>25 Q Any law school?</p>	<p style="text-align: right;">Page 16</p> <p>1 Q Okay. How long have you been owner of</p> <p>2 American Made Media Holding?</p> <p>3 A I think we established it April 2018.</p> <p>4 Q Do you have any -- does American Made Media</p> <p>5 Holding have any other clients -- well, I guess I need</p> <p>6 to ask this question. Is Donald J. Trump for</p> <p>7 President, Inc. a client of American Made Media</p> <p>8 Holding?</p> <p>9 A Yes, sir.</p> <p>10 Q And does American Made Media Holding have</p> <p>11 other clients currently other than Donald J. Trump for</p> <p>12 President, Inc.?</p> <p>13 A Yes, sir.</p> <p>14 Q Okay. Is Donald J. Trump for President, Inc.</p> <p>15 still a client of American Made Media Holding?</p> <p>16 A I think that was why I hesitated answering</p> <p>17 your last question, because Donald J. Trump for</p> <p>18 President, Inc. is no longer purchasing media.</p> <p>19 Q Okay. And why not?</p> <p>20 A Because it's no longer a campaign.</p> <p>21 Q Okay. What do you mean "it's no longer a</p> <p>22 campaign"?</p> <p>23 A It's winding down so there's no media spent,</p> <p>24 and we legally cannot purchase media.</p> <p>25 Q Okay. Do you know if there is a timetable for</p>

<p style="text-align: right;">Page 17</p> <p>1 the winding down?</p> <p>2 MR. STONEROCK: Objection, irrelevant, not</p> <p>3 reasonably -- not reasonably calculated to lead to</p> <p>4 the discovery of admissible evidence. I'm gonna</p> <p>5 instruct the witness not to answer.</p> <p>6 MR. PHILLIPS: Okay.</p> <p>7 BY MR. PHILLIPS:</p> <p>8 Q Has American Made Media Holding received</p> <p>9 approximately \$166 million from Donald J. Trump for</p> <p>10 President, Inc.?</p> <p>11 A Roughly, yes, sir.</p> <p>12 Q Okay. And that was in media buy services?</p> <p>13 A Yes, sir.</p> <p>14 Q Does that include production of the media?</p> <p>15 A In some cases, yes, sir.</p> <p>16 Q Yesterday I was sent a Dropbox of, let's see,</p> <p>17 25 or 26 -- bear with me. I believe 24 videos with a</p> <p>18 message from your counsel that said, "Here's a Dropbox</p> <p>19 link with campaign ads relevant to Mr. Dollman's</p> <p>20 deposition," and there were 24 campaign ads. Do you</p> <p>21 know how those are relevant to your deposition?</p> <p>22 A Yes, sir.</p> <p>23 Q How?</p> <p>24 A Because we were trying to correct the</p> <p>25 narrative that Omarosa was publicly saying about the</p>	<p style="text-align: right;">Page 19</p> <p>1 Q Okay. Do you know how long Omarosa Manigault</p> <p>2 Newman has known Mr. Trump?</p> <p>3 MR. STONEROCK: Calls for speculation, lacks</p> <p>4 foundation.</p> <p>5 You can answer, Sean.</p> <p>6 THE WITNESS: I think it was 15 or so years.</p> <p>7 BY MR. PHILLIPS:</p> <p>8 Q Okay. Do you know if she's spoken with him</p> <p>9 more than one time?</p> <p>10 MR. STONEROCK: Same objection.</p> <p>11 THE WITNESS: I would assume so.</p> <p>12 BY MR. PHILLIPS:</p> <p>13 Q Okay. Do you have an opinion as to whether --</p> <p>14 I believe it was racist and sexist. Do you have an</p> <p>15 opinion as to whether Donald J. Trump is sexist?</p> <p>16 A No, sir.</p> <p>17 Q You don't have an --</p> <p>18 A Do I have an opinion? No, I don't believe he</p> <p>19 is, sir.</p> <p>20 Q Okay. Is someone free to have an opinion in</p> <p>21 this country about whether somebody is racist or</p> <p>22 sexist?</p> <p>23 MR. STONEROCK: Objection, incomplete</p> <p>24 hypothetical, calls for a legal conclusion, vague</p> <p>25 and ambiguous as to the term "free."</p>
<p style="text-align: right;">Page 18</p> <p>1 president and the campaign.</p> <p>2 Q Okay. And what was -- what narrative did you</p> <p>3 have to correct?</p> <p>4 A Pretty much every statement that she was</p> <p>5 saying about the campaign.</p> <p>6 Q Okay. Anything specifically that you had to</p> <p>7 correct?</p> <p>8 A That the president is racist and sexist.</p> <p>9 Q You don't -- do you -- is it true that the</p> <p>10 president is racist?</p> <p>11 A No, sir.</p> <p>12 Q How well do you know Donald J. Trump?</p> <p>13 A Just not well to the point of, like, personal</p> <p>14 relationship or anything. Enough to speak with him</p> <p>15 once, but that's it.</p> <p>16 Q You've spoken with him once?</p> <p>17 A Yes, sir.</p> <p>18 Q So would you agree with me that Omarosa</p> <p>19 Manigault Newman knows Donald Trump better than Sean</p> <p>20 Dollman does?</p> <p>21 MR. STONEROCK: Calls for speculation, lacks</p> <p>22 foundation.</p> <p>23 You can answer, Sean, if you know.</p> <p>24 THE WITNESS: Yes.</p> <p>25 BY MR. PHILLIPS:</p>	<p style="text-align: right;">Page 20</p> <p>1 You can answer it if you understand it, Sean.</p> <p>2 THE WITNESS: Can you say it again, sir?</p> <p>3 BY MR. PHILLIPS:</p> <p>4 Q Yeah. Is someone allowed in the United States</p> <p>5 of America to have an opinion about whether they</p> <p>6 consider somebody else racist?</p> <p>7 MR. STONEROCK: Objection, incomplete</p> <p>8 hypothetical, calls for a legal conclusion.</p> <p>9 You can answer if you understand, Sean.</p> <p>10 THE WITNESS: Yes, sir.</p> <p>11 BY MR. PHILLIPS:</p> <p>12 Q And is somebody allowed to have an opinion in</p> <p>13 this country about whether they consider somebody</p> <p>14 sexist?</p> <p>15 MR. STONEROCK: Same objection.</p> <p>16 THE WITNESS: Yes, sir.</p> <p>17 BY MR. PHILLIPS:</p> <p>18 Q Did you find the statements that -- we'll come</p> <p>19 back to that.</p> <p>20 Let's do this. Can you see any portion of --</p> <p>21 of my screen?</p> <p>22 A Yes, sir.</p> <p>23 Q Okay. And it says "Campaign Ads 1 through</p> <p>24 24"?</p> <p>25 A Yes, sir.</p>

<p style="text-align: right;">Page 21</p> <p>1 Q Okay. Can you now see a video uploading or --</p> <p>2 or booting up?</p> <p>3 A Negative. All I see is the highlighted</p> <p>4 campaign.</p> <p>5 Q Now can you?</p> <p>6 A No, sir.</p> <p>7 Q Okay. If I play this video, can you -- let me</p> <p>8 know if you can watch it.</p> <p>9 A No, sir.</p> <p>10 MR. STONEROCK: We can hear it but not watch</p> <p>11 -- see it, John.</p> <p>12 MR. PHILLIPS: Okay. Let me fix it.</p> <p>13 BY MR. PHILLIPS:</p> <p>14 Q Okay. I'm sharing my screen now. Let's try</p> <p>15 now. Can you see that?</p> <p>16 A It still says starting the screen sharing.</p> <p>17 Q Okay.</p> <p>18 MR. STONEROCK: John, you should open the</p> <p>19 video before you start your screen sharing.</p> <p>20 MR. PHILLIPS: Thanks, Ryan.</p> <p>21 BY MR. PHILLIPS:</p> <p>22 Q Ah-ha. Now do you see the intro to the video?</p> <p>23 A No, sir.</p> <p>24 Q It's got the green box around it like you do.</p> <p>25 So you can hear that but not see it?</p>	<p style="text-align: right;">Page 23</p> <p>1 President Trump?</p> <p>2 UNKNOWN SPEAKER: I'm very honored</p> <p>3 and grateful that he signed the First Step Act, so</p> <p>4 I have nothing but respect and thankfulness for</p> <p>5 that.</p> <p>6 ALICE JOHNSON: I can do everything. I want</p> <p>7 to thank President Donald John Trump.</p> <p>8 UNKNOWN SPEAKER: I love President Trump</p> <p>9 because to him every life matters, lives of African</p> <p>10 Americans, lives of all races about unity and</p> <p>11 togetherness. And that's one of the main reasons</p> <p>12 why I -- why I voted for the president.</p> <p>13 DONALD J. TRUMP: We are reminded of our</p> <p>14 nation's path towards civil rights and the work</p> <p>15 that still remains to be done.</p> <p>16 (End of playing video.)</p> <p>17 BY MR. PHILLIPS:</p> <p>18 Q Was that a commercial that was, I guess,</p> <p>19 produced or distributed by American Made Media Holding?</p> <p>20 A Yes, sir.</p> <p>21 Q For what purpose?</p> <p>22 A Again, for correcting the narrative that</p> <p>23 Omarosa was publicly saying.</p> <p>24 Q What specifically?</p> <p>25 A That President Trump is racist.</p>
<p style="text-align: right;">Page 22</p> <p>1 A Yes, sir.</p> <p>2 MR. PHILLIPS: The same for you, Beth? Are</p> <p>3 you not seeing that on your end?</p> <p>4 COURT REPORTER: Exactly. I can hear it but</p> <p>5 not see it.</p> <p>6 BY MR. PHILLIPS:</p> <p>7 Q Same?</p> <p>8 A Same, sir.</p> <p>9 Q I pulled up videos last time. I'm not quite</p> <p>10 sure why it's not pulling it up. Can you see my</p> <p>11 desktop?</p> <p>12 A No, sir.</p> <p>13 Q Let me know if anything changes. Video.</p> <p>14 There we go. Let's try this way. I assume you can't</p> <p>15 see that.</p> <p>16 A No, I can see it.</p> <p>17 Q Can you? All right. So you can see that</p> <p>18 commercial, Mr. Dollman?</p> <p>19 A Yes, sir.</p> <p>20 Q Okay. Let's watch it.</p> <p>21 (Playing video:)</p> <p>22 UNKNOWN SPEAKER: President Donald Trump,</p> <p>23 everything he stands for I believe in. I stand</p> <p>24 with him. I fight with him. I ride with him.</p> <p>25 UNKNOWN SPEAKER: How do you feel about</p>	<p style="text-align: right;">Page 24</p> <p>1 Q Let's go on to 2, which is a 35-second ad.</p> <p>2 Can you see that? Can you see that video?</p> <p>3 A Yes, sir.</p> <p>4 (Playing video:)</p> <p>5 UNKNOWN SPEAKER: I'm blessed to be able to</p> <p>6 run inner city youth programs and to also teach in</p> <p>7 prisons across America. The inmates in my federal</p> <p>8 prison program literally received days off their</p> <p>9 sentence just for attending my class, and that's</p> <p>10 thanks to President Donald Trump and his First Step</p> <p>11 Act. President Trump cared about these Americans</p> <p>12 and their families even when so many others had</p> <p>13 left them behind and had written them off. I'm</p> <p>14 forever grateful for President Trump for that.</p> <p>15 (End of video.)</p> <p>16 BY MR. PHILLIPS:</p> <p>17 Q Referring to, I guess, ad -- campaign ad</p> <p>18 number 2 that was sent to us, was that produced or</p> <p>19 distributed by American Made Media Holding?</p> <p>20 MR. STONEROCK: Objection, compound, vague</p> <p>21 and ambiguous as to produced or distributed.</p> <p>22 MR. PHILLIPS: Sure.</p> <p>23 BY MR. PHILLIPS:</p> <p>24 Q Was that -- was that commercial, campaign ad</p> <p>25 number 2 --</p>

<p style="text-align: right;">Page 25</p> <p>1 MR. PHILLIPS: And we'll attach 1 as Exhibit 1</p> <p>2 and 2 as Exhibit 2 to this deposition and -- and go</p> <p>3 on through with that nomenclature, which we'll</p> <p>4 delineate as we go forward.</p> <p>5 (Respondent's Exhibits 1 and 2 were identified</p> <p>6 and later marked for identification.)</p> <p>7 BY MR. PHILLIPS:</p> <p>8 Q But was campaign ad number 2 produced by</p> <p>9 American Made Media Holding?</p> <p>10 MR. STONEROCK: Vague and ambiguous as to</p> <p>11 produced.</p> <p>12 You can answer, Sean, if you know.</p> <p>13 THE WITNESS: Paid for by American Made Media</p> <p>14 through a subcontractor, so the subcontractor</p> <p>15 actually produced it.</p> <p>16 BY MR. PHILLIPS:</p> <p>17 Q Okay. Who was the subcontractor?</p> <p>18 A For that one it -- it was either We Are</p> <p>19 Politics -- there was a couple. So that was actually</p> <p>20 during convention. Right? So there was a couple</p> <p>21 different entities that produced and put the videos</p> <p>22 together for convention.</p> <p>23 Q Okay. Where were these distributed? Where</p> <p>24 was that one distributed, I guess?</p> <p>25 A That would have been digital, and then also</p>	<p style="text-align: right;">Page 27</p> <p>1 Q Do you know any comments or can you identify</p> <p>2 any comments Omarosa Manigault Newman made about</p> <p>3 African-American inmates or Trump's treatment of</p> <p>4 African-American inmates?</p> <p>5 MR. STONEROCK: Same objections.</p> <p>6 THE WITNESS: No, sir.</p> <p>7 BY MR. PHILLIPS:</p> <p>8 Q Okay. So is it your contention that this</p> <p>9 campaign ad was designed to be a counternarrative of</p> <p>10 comments Omarosa Manigault Newman made?</p> <p>11 A Yes, sir.</p> <p>12 Q How?</p> <p>13 A Racism. She said the president was racist.</p> <p>14 Q Okay. So just putting in an ad which features</p> <p>15 African Americans contradicts racism?</p> <p>16 A Features or --</p> <p>17 Q Actually -- actually -- I'm sorry. Go ahead.</p> <p>18 A So you said "features African Americans." So</p> <p>19 I don't think that just because it features African</p> <p>20 Americans contradicts racism. But promoting</p> <p>21 and permanently funding HBCUs and then, also, the First</p> <p>22 Step Act and everything, yes, it does.</p> <p>23 Q What is racism?</p> <p>24 A What -- what is racism?</p> <p>25 Q Yeah. You've used the word a couple times</p>
<p style="text-align: right;">Page 26</p> <p>1 during convention.</p> <p>2 Q Okay. Digital. Who was the focus of the</p> <p>3 digital campaign?</p> <p>4 A Anybody that will watch it for the campaign.</p> <p>5 Q Was it targeted towards African Americans?</p> <p>6 A I think it was targeted to voters.</p> <p>7 Q Okay. What role, if any, did American Made</p> <p>8 Media Holdings have with -- with campaign ad number 2?</p> <p>9 A I don't understand that question. Can you</p> <p>10 rephrase it?</p> <p>11 Q What -- what did -- did American Made Media</p> <p>12 Holding have anything to do with whether production or</p> <p>13 distribution with campaign ad number 2 that we just</p> <p>14 watched?</p> <p>15 A It would have paid for the production of the</p> <p>16 campaign, and then also the distribution through</p> <p>17 digital assets or even during the convention.</p> <p>18 Q Okay. Are you aware of any statements Omarosa</p> <p>19 Manigault Newman made in any way disparaging or</p> <p>20 discussing the First Step Act?</p> <p>21 MR. STONEROCK: Calls for speculation, lacks</p> <p>22 foundation.</p> <p>23 You can answer if you know, Sean.</p> <p>24 THE WITNESS: Not to my knowledge.</p> <p>25 BY MR. PHILLIPS:</p>	<p style="text-align: right;">Page 28</p> <p>1 and said Omarosa was guilty of portraying Donald Trump</p> <p>2 as a racist. What is racism?</p> <p>3 A She actually said --</p> <p>4 MR. STONEROCK: His definition of racism?</p> <p>5 MR. PHILLIPS: His definition. I just want to</p> <p>6 make sure we're on the same page. What he's</p> <p>7 referring to related to racism.</p> <p>8 THE WITNESS: Yeah, I'm referring to Omarosa's</p> <p>9 comment of saying that the president is racist, not</p> <p>10 comments of, like, what is speculating or what the</p> <p>11 definition of racism is. But she said that the</p> <p>12 president is racist. So that comment of saying</p> <p>13 that he's racist would -- that's what we were</p> <p>14 trying to correct.</p> <p>15 My definition of racism is someone that</p> <p>16 probably -- I mean, someone that hates or despises</p> <p>17 or dislikes another individual based off of the</p> <p>18 color of their skin.</p> <p>19 BY MR. PHILLIPS:</p> <p>20 Q Merely dislikes, not has preferential</p> <p>21 treatment towards ones own race?</p> <p>22 A Say that again. Sorry. I need to turn it up.</p> <p>23 Q Is having preferential treatment towards ones</p> <p>24 own race racism?</p> <p>25 MR. STONEROCK: Incomplete hypothetical, calls</p>

<p style="text-align: right;">Page 29</p> <p>1 for speculation, lacks foundation.</p> <p>2 You can answer, Sean, if you understand.</p> <p>3 THE WITNESS: Can you rephrase it?</p> <p>4 BY MR. PHILLIPS:</p> <p>5 Q Sure. My understanding of -- of -- and I</p> <p>6 realize racism's a complex topic, so I don't want to</p> <p>7 just say one sentence is your definition of racism.</p> <p>8 But you discussed how, you know, I guess, being</p> <p>9 negative to one race is racism. But I'm asking whether</p> <p>10 preferential treatment, so -- so white people</p> <p>11 preferring white people, is that -- is that racism in</p> <p>12 your definition?</p> <p>13 MR. STONEROCK: Objection, incomplete</p> <p>14 hypothetical, calls for speculation, lacks</p> <p>15 foundation.</p> <p>16 You can answer if you understand, Sean.</p> <p>17 THE WITNESS: Yeah, I mean, I didn't say a</p> <p>18 certain race. Right? I said anybody or any human</p> <p>19 or anything by the color of their skin. So you can</p> <p>20 be white and not like white people -- right --</p> <p>21 and be racist against your own race, yes.</p> <p>22 BY MR. PHILLIPS:</p> <p>23 Q Okay. Let's move on to number 3.</p> <p>24 (Playing video:)</p> <p>25 UNKNOWN SPEAKER: I caught my very first</p>	<p style="text-align: right;">Page 31</p> <p>1 ad number 3 and why that was produced to us.</p> <p>2 A Because the president promised that he was</p> <p>3 gonna be there for the American people, and this video</p> <p>4 right here said he kept his promises. And what he said</p> <p>5 he was gonna do, he's gonna do. And that it didn't</p> <p>6 matter what race you were or anything, he's gonna look</p> <p>7 out for the American individuals and families, which</p> <p>8 are the promises he made.</p> <p>9 Q And what specifically did Omarosa Manigault</p> <p>10 Newman do that contradicted any of that or disparaged</p> <p>11 any of that?</p> <p>12 A She said he was racist.</p> <p>13 Q Okay. Did she comment about that specific</p> <p>14 incarcerated African-American man?</p> <p>15 MR. STONEROCK: Calls for speculation, lacks</p> <p>16 foundation, incomplete hypothetical.</p> <p>17 You can answer if you know, Sean.</p> <p>18 THE WITNESS: Not to my knowledge I don't. I</p> <p>19 am unsure of that.</p> <p>20 BY MR. PHILLIPS:</p> <p>21 Q Okay. Everything Trump is saying -- I think</p> <p>22 there was a line in there.</p> <p>23 (Playing video:)</p> <p>24 UNKNOWN SPEAKER: I mean, is he serious?</p> <p>25 Because everything that he was saying that he</p>
<p style="text-align: right;">Page 30</p> <p>1 felony conviction at 16 years old. I was arrested</p> <p>2 for a string of bank robberies. And as I laid on</p> <p>3 that stainless steel cell, shackled by my hands</p> <p>4 and my feet, I heard God utter into my spirit: My</p> <p>5 son, I honored what you asked me to do.</p> <p>6 President Trump, he had made a bunch of</p> <p>7 promises. Let me just be transparent. When he</p> <p>8 first started talking about the things he was gonna</p> <p>9 to do, I'm sitting there going: Wait a minute</p> <p>10 here. I mean, is he serious? Because everything</p> <p>11 that he was saying that he wanted to do was the</p> <p>12 stuff that needs to be done.</p> <p>13 (End of playing video.)</p> <p>14 BY MR. PHILLIPS:</p> <p>15 Q Okay. Referring to the ad we just showed you,</p> <p>16 campaign ad number 3, produced to us by your counsel,</p> <p>17 how -- how at all did that counteract any disparaging</p> <p>18 or defamatory comment by Omarosa Manigault Newman?</p> <p>19 MR. STONEROCK: Objection, compound, calls for</p> <p>20 speculation, lacks foundation.</p> <p>21 You can answer, Sean, if you know.</p> <p>22 THE WITNESS: The -- can you say that again?</p> <p>23 I apologize.</p> <p>24 BY MR. PHILLIPS:</p> <p>25 Q Yeah. I'm just -- just curious about campaign</p>	<p style="text-align: right;">Page 32</p> <p>1 wanted to do was the stuff that needs to be done.</p> <p>2 (End of video.)</p> <p>3 BY MR. PHILLIPS:</p> <p>4 Q Okay. "Everything he said" -- and it's</p> <p>5 actually on the screen, "Everything he said he was</p> <p>6 going to do needed to be done." Did Omarosa Manigault</p> <p>7 Newman say anything about Mr. Trump that contradicted</p> <p>8 that statement?</p> <p>9 MR. STONEROCK: Calls for speculation, lacks</p> <p>10 foundation, incomplete hypothetical.</p> <p>11 You can answer if you know, Sean.</p> <p>12 THE WITNESS: Statements and public statements</p> <p>13 of being a racist, I would say it would make it to</p> <p>14 where she said that he is not going to actually</p> <p>15 help all Americans, just specific Americans. So I</p> <p>16 would say, in a roundabout way, yes. But</p> <p>17 specifically to that, I am unsure.</p> <p>18 BY MR. PHILLIPS:</p> <p>19 Q Okay. Was Omarosa the only person in the</p> <p>20 entire world calling Donald Trump a racist?</p> <p>21 MR. STONEROCK: Calls for speculation, lacks</p> <p>22 foundation, vague as to time.</p> <p>23 You can answer if you know, Sean.</p> <p>24 THE WITNESS: In the entire world, no, sir.</p> <p>25 MR. PHILLIPS: Okay. I'm going to attach 3 as</p>

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1 Plaintiff's Exhibit 3.
 2 (Respondent's Exhibit 3 was identified and
 3 later marked for identification.)
 4 BY MR. PHILLIPS:
 5 Q Moving on to campaign ad 4. Or was that 4?
 6 No. This is the human side.
 7 (Playing video:)
 8 UNKNOWN SPEAKER: Back in 2002, I was arrested
 9 for conspiracy. I was convicted on that single
 10 charge for 50 grams or more of crack or five
 11 kilograms of cocaine, and sentenced to life without
 12 the possibility of parole.
 13 With the First Step Act, that was something
 14 that needed to be done for quite some time.
 15 And President Trump was able to come in there. You
 16 have to look at the human side.
 17 (End of video.)
 18 (Respondent's Exhibit 4 was identified and
 19 later marked for identification.)
 20 BY MR. PHILLIPS:
 21 Q The human side, was that an ad in any way done
 22 or distributed by American Made Media Holding?
 23 MR. STONEROCK: Vague as to done or
 24 distributed.
 25 You can answer if you know, Sean.

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1 THE WITNESS: We paid a subcontractor for
 2 production of that ad, yes.
 3 BY MR. PHILLIPS:
 4 Q And then you -- American Made distributed it?
 5 MR. STONEROCK: Vague as to the term
 6 "distributed."
 7 You can answer, Sean.
 8 THE WITNESS: We paid for the distribution of
 9 it, yes.
 10 BY MR. PHILLIPS:
 11 Q Okay. And do you know where that one was
 12 distributed?
 13 A That one looks like it was, obviously, a
 14 digital ad, and I would think by the production of it
 15 possibly also for the convention as well.
 16 Q Okay. Do you know if that was targeted to
 17 African-American individuals or African-American
 18 communities?
 19 A I think it was more of the First Step Act,
 20 and then the president's policies to get the First Step
 21 Act through.
 22 Q Can one -- bear with me on this hypothetical.
 23 Can one pass pro African-American legislation and still
 24 be racist?
 25 MR. STONEROCK: Calls for speculation, lacks

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1 foundation, incomplete hypothetical.
 2 You can answer the question if you understand
 3 it, Sean.
 4 THE WITNESS: I think if you're truly racist,
 5 then you probably wouldn't promote and push
 6 legislation to help a certain race. So, no, I
 7 don't think so.
 8 BY MR. PHILLIPS:
 9 Q Okay. So if you're truly racist, you're gonna
 10 do nothing to help a certain race even if it benefits
 11 you?
 12 MR. STONEROCK: Calls for speculation, lacks
 13 foundation, incomplete hypothetical.
 14 You can answer, Sean.
 15 THE WITNESS: Are you saying for the benefit
 16 of an individual if he's truly racist?
 17 BY MR. PHILLIPS:
 18 Q Obviously these were paid to -- these were
 19 paid ads to achieve votes, were they not?
 20 A They were paid ads to correct a narrative,
 21 yes, sir. Right. And then --
 22 Q For what purpose?
 23 A -- the narrative being --
 24 Say again, sir.
 25 Q What -- what's the purpose of correcting the

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1 narrative?
 2 A The purpose of correcting a narrative?
 3 Q Yes.
 4 A To get the message to the voters to correct
 5 the narrative.
 6 Q Okay. And so the voters to -- so it's -- does
 7 it matter what somebody thinks or what they do in this
 8 instance? Obviously it seems to me that the purpose
 9 was to get -- you had a -- you had a campaign going on,
 10 so the purpose was to get votes for Donald Trump;
 11 correct?
 12 A The purpose is -- it's -- it's kind of
 13 two-sided. Right? So if you are going to correct the
 14 narrative, you want to make sure that people understand
 15 that the president is not racist and he does want to
 16 look out for the American people and it doesn't matter
 17 what race you are.
 18 But, also, that if you are on -- if you are
 19 borderline or on the edge of a vote, then, yes. Like,
 20 it is to let them know that if your vote is because of
 21 a racism thing that another individual said, then it's
 22 to correct the narrative.
 23 Q Do you have the name of any individual who
 24 said they did not vote for Donald Trump because Omarosa
 25 Manigault Newman said he was racist?

<p style="text-align: right;">Page 37</p> <p>1 A No, sir.</p> <p>2 Q Okay. Do you have a name of any individual</p> <p>3 who said he did not -- he or she did not vote for</p> <p>4 Donald J. Trump because he was sexist, because Omarosa</p> <p>5 said he was sexist?</p> <p>6 A No, sir.</p> <p>7 Q Okay.</p> <p>8 A Also, to follow up on that, it's not like I</p> <p>9 have a very big circle of individuals I talk to daily,</p> <p>10 so . . .</p> <p>11 Q Okay. But you got -- your company got paid</p> <p>12 200 and -- \$166 million to run a campaign for Donald</p> <p>13 Trump. Did you spend any of that on polling to</p> <p>14 determine what Donald Trump's true opinion was in the</p> <p>15 African-American community, or what the</p> <p>16 African-American community's true opinion was of Donald</p> <p>17 Trump?</p> <p>18 MR. STONEROCK: You're asking about the</p> <p>19 campaign or the, you know, separate entity that did</p> <p>20 media buy?</p> <p>21 MR. PHILLIPS: I mean, that's the problem with</p> <p>22 this. Okay. Fair enough.</p> <p>23 BY MR. PHILLIPS:</p> <p>24 Q Did American -- with the \$166 million received</p> <p>25 by American Made Media Holding, did they conduct any</p>	<p style="text-align: right;">Page 39</p> <p>1 A That was not my role on the campaign, so I</p> <p>2 cannot cite to it.</p> <p>3 MR. PHILLIPS: Okay. Moving on to campaign ad</p> <p>4 number 5, which we'll attach as Exhibit 5.</p> <p>5 (Respondent's Exhibit 5 was identified and</p> <p>6 later marked for identification.)</p> <p>7 (Playing video:)</p> <p>8 ERIC BALCOM: It's an overwhelming feeling,</p> <p>9 and I'm just glad to be free.</p> <p>10 VOICEOVER: Eric Balcom has waited 16 years</p> <p>11 for this moment. His first breaths of freedom</p> <p>12 after being released from federal prison in Jesup,</p> <p>13 Georgia.</p> <p>14 ERIC BALCOM: I can't be bitter about all that</p> <p>15 I've missed. I've just got to be thankful</p> <p>16 and grateful for the new memories that I can make.</p> <p>17 (End of video.)</p> <p>18 BY MR. PHILLIPS:</p> <p>19 Q What is the First Step Act, to your</p> <p>20 understanding?</p> <p>21 MR. STONEROCK: Calls for a legal conclusion,</p> <p>22 lacks foundation, calls for speculation.</p> <p>23 You can answer it if you have an</p> <p>24 understanding, Sean.</p> <p>25 THE WITNESS: I believe it's to shorten a</p>
<p style="text-align: right;">Page 38</p> <p>1 focus groups to determine whether Omarosa Manigault</p> <p>2 Newman's expressed opinion that Donald Trump was racist</p> <p>3 was in need of -- of countermessaging? Was there any</p> <p>4 focus group on that?</p> <p>5 MR. STONEROCK: Calls for speculation, lacks</p> <p>6 foundation.</p> <p>7 You can answer, Sean, if you know.</p> <p>8 THE WITNESS: American Made Media Consultants</p> <p>9 or Holdings didn't -- never spent money on polling.</p> <p>10 It is not actually media driven -- right -- so</p> <p>11 polling is more internal for the campaign.</p> <p>12 BY MR. PHILLIPS:</p> <p>13 Q So why did either American Made -- well, I</p> <p>14 guess, why did Donald J. Trump for President, Inc. feel</p> <p>15 that -- like on what did -- did Donald J. Trump for</p> <p>16 President, Inc. base its decision that it needed to run</p> <p>17 these at least 24 campaign ads because of Omarosa</p> <p>18 Manigault Newman?</p> <p>19 MR. STONEROCK: Calls for speculation, lacks</p> <p>20 foundation.</p> <p>21 You can answer, Sean, if you know.</p> <p>22 THE WITNESS: Probably from polling.</p> <p>23 BY MR. PHILLIPS:</p> <p>24 Q Can you -- can you cite to any poll? Do we --</p> <p>25 do we know who did the polling?</p>	<p style="text-align: right;">Page 40</p> <p>1 sentence for an individual for -- I guess that</p> <p>2 would probably be it -- for, like, good behavior</p> <p>3 and for crimes that may not have been -- and this</p> <p>4 is just what I think it is. I'm --</p> <p>5 BY MR. PHILLIPS:</p> <p>6 Q Yeah, yeah.</p> <p>7 A -- not really sure. Right. Crimes that --</p> <p>8 where they got more time or more sentence than they</p> <p>9 probably -- it just didn't fit the crime.</p> <p>10 Q Okay. And I -- I don't want to ask you a</p> <p>11 question I've already asked you. I think this is</p> <p>12 different. But can one -- well -- well, let me go</p> <p>13 back.</p> <p>14 This commercial, campaign ad number 5, can you</p> <p>15 point to any statement by Omarosa Manigault Newman that</p> <p>16 addressed any of the issues in campaign number 5,</p> <p>17 Mr. Balcom, First Step Act, anything related to those</p> <p>18 issues?</p> <p>19 MR. STONEROCK: Objection, compound, vague</p> <p>20 and ambiguous, vague as to any of the issues.</p> <p>21 Sean, you can answer if you understand the</p> <p>22 question.</p> <p>23 THE WITNESS: Specific statements, not off the</p> <p>24 top of my head. Multiple statements on television,</p> <p>25 Twitter, radio, I would say yes.</p>

<p style="text-align: right;">Page 41</p> <p>1 BY MR. PHILLIPS:</p> <p>2 Q Okay. Again, the general -- the general</p> <p>3 comments related to racism and Donald Trump; right?</p> <p>4 A Correct.</p> <p>5 MR. PHILLIPS: Okay. Campaign ad 6, Omarosa's</p> <p>6 Exhibit 6.</p> <p>7 (Respondent's Exhibit 6 was identified and</p> <p>8 later marked for identification.)</p> <p>9 UNKNOWN SPEAKER: I stand for all his</p> <p>10 policies, both religiously and politically.</p> <p>11 UNKNOWN SPEAKER: He's already done so much</p> <p>12 for the country. And he's -- he's really doing a</p> <p>13 great job.</p> <p>14 UNKNOWN SPEAKER: As far as abortion goes,</p> <p>15 that was one of my big issues. I very heavily</p> <p>16 stand for the unborn, and so his -- his policies as</p> <p>17 far as that goes has really, really affected me.</p> <p>18 (End of video.)</p> <p>19 BY MR. PHILLIPS:</p> <p>20 Q Do you know of Donald Trump's opinions, true</p> <p>21 opinions, about abortion?</p> <p>22 MR. STONEROCK: Objection, calls for</p> <p>23 speculation, lacks foundation, vague as to true</p> <p>24 opinions.</p> <p>25 You can answer if you know, Sean.</p>	<p style="text-align: right;">Page 43</p> <p>1 Q Sure. I'm just trying to understood, like,</p> <p>2 Mr. Balcom or the young lady who was talking about</p> <p>3 Donald Trump's abortion views and that's why she</p> <p>4 supported him, do you know whether they -- they hold</p> <p>5 any views whatsoever about whether -- even though they</p> <p>6 agree with him on certain issues that they feel that</p> <p>7 Donald Trump is a racist?</p> <p>8 MR. STONEROCK: Objection, calls for</p> <p>9 speculation, lacks foundation, mischaracterizes the</p> <p>10 videos.</p> <p>11 You can answer, Sean.</p> <p>12 THE WITNESS: No, sir.</p> <p>13 BY MR. PHILLIPS:</p> <p>14 Q Okay.</p> <p>15 MR. PHILLIPS: Omarosa's Exhibit -- that was</p> <p>16 6. Now we're going to 7.</p> <p>17 (Respondent's Exhibit 7 was identified and</p> <p>18 later marked for identification.)</p> <p>19 BY MR. PHILLIPS:</p> <p>20 Q Based upon the shape of that one, was that an</p> <p>21 Instagram ad? Do you know where that ad aired,</p> <p>22 campaign 6?</p> <p>23 A No, sir.</p> <p>24 Q Okay.</p> <p>25 A I would assume digital based off of the look</p>
<p style="text-align: right;">Page 42</p> <p>1 THE WITNESS: Oh, okay. All right.</p> <p>2 No, sir.</p> <p>3 BY MR. PHILLIPS:</p> <p>4 Q Okay. I just -- I see a trend with 4, 5, 6,</p> <p>5 3. They're -- they're isolated African-American</p> <p>6 individuals. Did you meet any of these individuals?</p> <p>7 MR. STONEROCK: Objection, mischaracterizes</p> <p>8 the advertisements, compound.</p> <p>9 You can -- you can answer, Sean, if you</p> <p>10 understand.</p> <p>11 THE WITNESS: No, sir.</p> <p>12 BY MR. PHILLIPS:</p> <p>13 Q Okay. Did you discuss whether they</p> <p>14 believed -- I mean, I understand they were a proponent</p> <p>15 of the First Step Act or -- or Donald Trump's abortion</p> <p>16 policies. But do you know whether these individual</p> <p>17 people featured in the commercial would believe that --</p> <p>18 or would have any views about whether or not Donald</p> <p>19 Trump is a racist?</p> <p>20 MR. STONEROCK: Calls for speculation, lacks</p> <p>21 foundation, mischaracterizes the videos.</p> <p>22 You can answer, Sean, if you understand.</p> <p>23 THE WITNESS: Can you -- can you repeat the</p> <p>24 question, please?</p> <p>25 BY MR. PHILLIPS:</p>	<p style="text-align: right;">Page 44</p> <p>1 of it.</p> <p>2 Q Okay. Do you have or does the campaign have</p> <p>3 either -- either American Made Media Holding or the</p> <p>4 campaign maintain the statistics for where these ads</p> <p>5 aired and how much was paid for each one?</p> <p>6 A We have a -- a rough estimate as of right now</p> <p>7 because it is multiple ads going out at one time.</p> <p>8 Q Okay.</p> <p>9 A But if we had to dive down into it, we would</p> <p>10 be able to pull the dollar amount anyway.</p> <p>11 Q Did Omarosa Manigault Newman address anything</p> <p>12 that you're aware of about Donald Trump's opinions on</p> <p>13 abortion?</p> <p>14 MR. STONEROCK: Calls for speculation, lacks</p> <p>15 foundation.</p> <p>16 You can answer, Sean.</p> <p>17 THE WITNESS: Can you repeat that again,</p> <p>18 please, sir?</p> <p>19 BY MR. PHILLIPS:</p> <p>20 Q Yeah. The campaign ad number 6 largely was</p> <p>21 addressed on abortion policies.</p> <p>22 A Uh-huh.</p> <p>23 Q Do you know whether Omarosa Manigault Newman</p> <p>24 made any statements about -- or can you identify any</p> <p>25 statements made by Omarosa Manigault Newman about</p>

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1 Trump's abortion policies?

2 MR. STONEROCK: Calls for speculation, lacks

3 foundation, mischaracterizes the advertising.

4 You can answer, Sean.

5 THE WITNESS: No, sir.

6 BY MR. PHILLIPS:

7 Q Okay. Campaign ad number 7, Exhibit Number 7.

8 (Playing video:)

9 PASTOR C. L. BRYANT: Hi, friends. I'm C. L.

10 Bryant. Black Voices for Trump is building a MAGA

11 army across America to do everything we possibly

12 can to get President Donald John Trump reelected.

13 Why? Because he has been the greatest champion

14 that black people have had in this country for a

15 long, long time. Help us, Black Voices for Trump,

16 reelect Donald John Trump to the presidency.

17 Become an official member of Black Voices for Trump

18 and help keep America great.

19 (End of video.)

20 BY MR. PHILLIPS:

21 Q Referring to campaign ad number 7 -- I -- I

22 guess let me ask a prerequisite question. What's the

23 difference between a fact and an opinion?

24 MR. STONEROCK: Objection, calls for a legal

25 conclusion, incomplete hypothetical.

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1 You can answer if you have an understanding,

2 Sean.

3 THE WITNESS: A fact and an opinion?

4 BY MR. PHILLIPS:

5 Q Yeah.

6 A I mean, to me it sounds dumb, but a fact is a

7 fact. Like there's an actual hard-telling truth behind

8 it, and then an opinion is your own formed belief about

9 an individual or anything. Right.

10 Q As Pastor Bryant said, that Donald Trump has

11 been the greatest champion for black people, is that a

12 fact or an opinion?

13 MR. STONEROCK: Objection, calls for a legal

14 conclusion, calls for speculation, lacks

15 foundation.

16 You can answer if you have an understanding.

17 THE WITNESS: What was the entire comment that

18 he said? Wasn't it in a long, long time?

19 BY MR. PHILLIPS:

20 Q Let me get it specifically correct.

21 A Because anything out of context, I guess,

22 would be . . .

23 (Playing video:)

24 UNKNOWN SPEAKER: . . . reelected. Why?

25 Because he has been the greatest champion that

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1 black people have had in this country for a long,

2 long time. Help us, Black Voices for Trump,

3 reelect Donald John Trump to the presidency.

4 Become an official member of Black Voices for Trump

5 and help keep America great.

6 (End of video.)

7 BY MR. PHILLIPS:

8 Q You were correct. So the subtitles, I can

9 read it.

10 I believe the quote was Donald Trump, he, but

11 Donald Trump, has been the greatest champion that black

12 people have had in this country for a long, long time.

13 Is that a fact or an opinion?

14 MR. STONEROCK: Objection, calls for a legal

15 conclusion, relevance.

16 You can answer if you have an understanding,

17 Sean.

18 THE WITNESS: I believe that's a fact.

19 BY MR. PHILLIPS:

20 Q Oh, okay.

21 A I mean, like, here's -- here's the issue,

22 though. It depends on -- it's an opinion and a fact to

23 me. Right? The fact is every other president before

24 Donald Trump has said that they're gonna look out for

25 the African-American community and other communities

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1 within America, and they haven't. President Trump

2 actually did stick to his promises, so that's a fact --

3 Q Okay. Isn't the president --

4 A -- for the community -- for the community.

5 Q And don't -- sorry.

6 It says that Donald Trump has been the

7 greatest champion -- the greatest single -- how many

8 greatest champions are there?

9 MR. STONEROCK: Objection, vague.

10 Sorry, John. Did you finish?

11 MR. PHILLIPS: Yeah. Well, let me start over.

12 BY MR. PHILLIPS:

13 Q I guess it's -- it's the pastor's words. Was

14 -- was Dr. King a greater champion for -- for black

15 people in this country than Donald Trump?

16 MR. STONEROCK: Objection, relevance, calls

17 for speculation, lacks foundation, incomplete

18 hypothetical.

19 Sean, you can answer if you have an

20 understanding of the question.

21 THE WITNESS: No, I -- I -- I guess I don't

22 understand the question. Can you please rephrase

23 it?

24 BY MR. PHILLIPS:

25 Q Was Dr. -- was Dr. Martin Luther King -- do

<p style="text-align: right;">Page 49</p> <p>1 you know who Dr. Martin Luther King is?</p> <p>2 A Yes, sir.</p> <p>3 Q Okay. Was Dr. Martin Luther King a greater</p> <p>4 champion for black people than Donald Trump?</p> <p>5 MR. STONEROCK: Objection, incomplete</p> <p>6 hypothetical, vague as to greater champion, calls</p> <p>7 for speculation, lacks foundation.</p> <p>8 You can answer it, Sean, if you have an</p> <p>9 understanding of the question.</p> <p>10 THE WITNESS: I think -- I think it's relevant</p> <p>11 to a time. Right? So was he greater at that time?</p> <p>12 Obviously, because Donald Trump wasn't around.</p> <p>13 But was Michael -- Michael Jordan the greatest</p> <p>14 basketball player of all time? Was he better than</p> <p>15 LeBron James? That's your problem. Right?</p> <p>16 So it's not within the same time and within</p> <p>17 that same time frame.</p> <p>18 BY MR. PHILLIPS:</p> <p>19 Q Donald Trump -- Donald Trump didn't exist at</p> <p>20 the same time as Dr. King?</p> <p>21 A Say it again.</p> <p>22 Q Did Donald Trump exist at the same time as Dr.</p> <p>23 King?</p> <p>24 MR. STONEROCK: Vague as to exist.</p> <p>25 BY MR. PHILLIPS:</p>	<p style="text-align: right;">Page 51</p> <p>1 great for the African-American community in the</p> <p>2 fact that he was president and he did have a lot of</p> <p>3 policies. But I think President Trump actually</p> <p>4 stuck -- stuck to his promises.</p> <p>5 And, again, I get what you're saying, that it</p> <p>6 is an opinion, but I think there is some factual</p> <p>7 background.</p> <p>8 BY MR. PHILLIPS:</p> <p>9 Q Did -- did President Obama ever call</p> <p>10 African-American countries shithole countries?</p> <p>11 MR. STONEROCK: Objection, calls for</p> <p>12 speculation, lacks foundation, relevance.</p> <p>13 You can answer, Sean, if you know.</p> <p>14 THE WITNESS: Not to my knowledge.</p> <p>15 BY MR. PHILLIPS:</p> <p>16 Q Did Donald Trump ever call African nations</p> <p>17 shithole countries?</p> <p>18 MR. STONEROCK: Calls for speculation, lacks</p> <p>19 foundation.</p> <p>20 You can answer if you know, Sean.</p> <p>21 THE WITNESS: I do not.</p> <p>22 BY MR. PHILLIPS:</p> <p>23 Q We'll come back to that.</p> <p>24 Campaign ad number 8.</p> <p>25 (Playing video:)</p>
<p style="text-align: right;">Page 50</p> <p>1 Q Did they live in the same . . .</p> <p>2 A I -- what I mean by that is, like, in the</p> <p>3 champion or in the -- like champion for African</p> <p>4 Americans. Right? So it wasn't the same -- not even</p> <p>5 the same time frame, no.</p> <p>6 Q Okay. Do you know how old Donald Trump is?</p> <p>7 A Early 70s.</p> <p>8 Q Okay. Is Barack Obama -- was Barack Obama a</p> <p>9 greater champion for black people than Donald Trump?</p> <p>10 MR. STONEROCK: Objection, vague as to greater</p> <p>11 champion, incomplete hypothetical, relevance.</p> <p>12 You can answer, Sean, if you have an</p> <p>13 understanding.</p> <p>14 THE WITNESS: I don't believe so, no.</p> <p>15 BY MR. PHILLIPS:</p> <p>16 Q Okay. But that's -- what I'm trying to get at</p> <p>17 is that's your opinion. Somebody could believe that</p> <p>18 Obama was far greater than Donald Trump for the African</p> <p>19 American and civil rights; right? That's -- that's --</p> <p>20 that's -- that's a matter of opinion; right?</p> <p>21 MR. STONEROCK: Objection, calls for a legal</p> <p>22 conclusion, incomplete hypothetical.</p> <p>23 You can answer, Sean.</p> <p>24 THE WITNESS: I think it still is based on</p> <p>25 some type of fact. Right? President Obama was</p>	<p style="text-align: right;">Page 52</p> <p>1 ALICE JOHNSON: I'm free to hug my family.</p> <p>2 UNKNOWN SPEAKER: Yes.</p> <p>3 ALICE JOHNSON: I'm free to start over. This</p> <p>4 is the greatest day of my life. My heart is just</p> <p>5 bursting with gratitude. I want to thank President</p> <p>6 Donald John Trump. Thank you, thank you, thank</p> <p>7 you.</p> <p>8 DONALD J. TRUMP: I'm Donald Trump and I</p> <p>9 approve this message.</p> <p>10 (End of video.)</p> <p>11 (Respondent's Exhibit 8 was identified and</p> <p>12 later marked for identification.)</p> <p>13 BY MR. PHILLIPS:</p> <p>14 Q Did -- did Ms. Johnson, in -- in campaign ad</p> <p>15 number 8, Exhibit 8, express her opinion about whether</p> <p>16 or not Donald Trump was a racist?</p> <p>17 A I do not know, sir.</p> <p>18 Q Okay. Did the fact that she said -- I mean,</p> <p>19 what comment by Omarosa Manigault Newman in any way was</p> <p>20 contradicted by Alice Johnson saying, "I'm free to</p> <p>21 start over," "my heart is just bursting"? I mean, was</p> <p>22 there anything that Ms. Newman said about Ms. Johnson</p> <p>23 or, I guess, the First Step Act? I know we've asked</p> <p>24 that, but I just want to go through all these</p> <p>25 commercials.</p>

<p style="text-align: right;">Page 53</p> <p>1 MR. STONEROCK: Calls for speculation, lacks 2 foundation. 3 You can answer if you understand the question, 4 Sean. 5 THE WITNESS: I think it still goes back to 6 the fact that she said he was racist. 7 BY MR. PHILLIPS: 8 Q Okay. So far we're at -- we're at campaign ad 9 number 8, and what I'm seeing is in -- in order to 10 respond to an allegation of racist, that Donald Trump 11 was racist, American Made Media Holding made a lot of 12 money finding African Americans who support Donald 13 Trump; is that correct? 14 MR. STONEROCK: Objection, misstates his 15 testimony, misstates the videos, compound, 16 argumentative. 17 You can answer if you understand the question, 18 Sean. 19 THE WITNESS: That's false. 20 BY MR. PHILLIPS: 21 Q What's false? 22 A That American Made Media Holding made a lot of 23 money off of this. 24 Q 166 -- do you know what portion of the \$166 25 million was made off of these 24 ads?</p>	<p style="text-align: right;">Page 55</p> <p>1 Q Okay. So there was a -- was it a monthly rate 2 or an annual rate that American Made Media Holding 3 negotiated with Donald J. Trump for President, Inc.? 4 MR. STONEROCK: Objection, misstates his 5 testimony. 6 You can answer if you know, Sean. 7 THE WITNESS: Yeah. I mean, I -- I guess I'm 8 failing to see how it's relevant to this. But, 9 yes, a monthly -- 10 BY MR. PHILLIPS: 11 Q Okay. 12 A -- fee, retainer. 13 Q Okay. Of which this -- this work was part of 14 the work done towards that retainer; right? 15 A Correct. Among -- among others, yes. 16 Q Okay. So this -- this -- these 24 ads weren't 17 produced out of the kindness of American Made Media 18 Holding's heart? 19 MR. STONEROCK: Objection, vague and ambiguous 20 as to out of the kindness of their heart. 21 You can answer, Sean, if you know. 22 THE WITNESS: Can you say that again, sir? I 23 apologize. 24 MR. PHILLIPS: Let's just move on to number 9. 25 I'll withdraw the question.</p>
<p style="text-align: right;">Page 54</p> <p>1 A None. 2 Q None. 3 A Correct. 4 Q Why? 5 A Say again. 6 Q Why? 7 A Because American Made Media Consulting was the 8 media aggregate and purchaser who hired subcontractors 9 to fulfill the requests. 10 Q You don't get a -- a contingency or placement 11 fee? Does American Made Media get a contingent fee or 12 a placement fee or any -- any percentage of -- of the 13 -- the amounts spent on this campaign? 14 A No, sir. 15 Q Was this intentionally done pro bono, or -- or 16 is this -- I guess I need to understand what American 17 -- how American Made Media Holding was compensated. 18 MR. STONEROCK: Vague as to intentional, vague 19 and ambiguous as to pro bono. 20 You can answer, Sean, if you know. 21 THE WITNESS: So American Made Media 22 Consultants was -- or Holding Company was not 23 compensated based off a per purchase or a 24 percentage, correct. 25 BY MR. PHILLIPS:</p>	<p style="text-align: right;">Page 56</p> <p>1 (Playing video:) 2 TONY RANKIN: I'm an Army vet, I was homeless, 3 I was sleeping in my car, and didn't have any hope 4 for a long time. 5 VOICEOVER: Then Tony Rankin was offered a 6 second chance. President Trump's opportunity zones 7 gave new investments to neglected communities, 8 and jobs are coming back. 9 TONY RANKIN: Life is good now. Life is worth 10 living. The president does want to help people 11 like myself to be lifted back up in these 12 low-income communities. 13 DONALD J. TRUMP: I'm Donald J. Trump and I 14 approve this message. 15 (End of video.) 16 (Respondent's Exhibit 9 was identified and 17 later marked for identification.) 18 BY MR. PHILLIPS: 19 Q That screen right there where you see Donald 20 Trump, D. J. Trump, with some legislation or executive 21 order or some document, do you know what that is? 22 A No, sir. 23 Q Okay. 24 A What the document itself is or -- 25 Q Correct.</p>

<p style="text-align: right;">Page 57</p> <p>1 A -- the location?</p> <p>2 Or I know -- I do not know the document, no.</p> <p>3 Q I think we all know the location.</p> <p>4 Do you know who the people are in that</p> <p>5 picture?</p> <p>6 A No, sir.</p> <p>7 Q Did Omarosa Manigault Newman ever say or can</p> <p>8 you -- can you point -- point to a statement where she</p> <p>9 said that the Congress or Donald Trump did not invest</p> <p>10 in neglected communities?</p> <p>11 MR. STONEROCK: Objection, calls for</p> <p>12 speculation, lacks foundation.</p> <p>13 You can answer, Sean, if you know.</p> <p>14 THE WITNESS: No, sir, not an individual</p> <p>15 statement.</p> <p>16 MR. STONEROCK: John, when we're at a good</p> <p>17 breaking point -- I mean, maybe it's not -- maybe</p> <p>18 you're not there yet, but can you just let me know?</p> <p>19 MR. PHILLIPS: I mean, I've got 14 -- 13 more</p> <p>20 videos to go, so it's whenever . . .</p> <p>21 MR. STONEROCK: I just -- are you done asking</p> <p>22 questions about that video?</p> <p>23 MR. PHILLIPS: Yeah, that video.</p> <p>24 MR. STONEROCK: Okay. So can we just take</p> <p>25 five minutes?</p>	<p style="text-align: right;">Page 59</p> <p>1 (Playing video:)</p> <p>2 DONALD J. TRUMP: So this is Historically</p> <p>3 Black Colleges and Universities executive order.</p> <p>4 It's very important to all of us. This group has</p> <p>5 been fantastic, many of which we were with</p> <p>6 yesterday --</p> <p>7 UNKNOWN SPEAKER: That's right.</p> <p>8 DONALD J. TRUMP: -- and really developed</p> <p>9 something very special.</p> <p>10 So thank you. Thank you all for being here.</p> <p>11 Thank you Mr. Vice President, also, Mike --</p> <p>12 MIKE PENCE: Thank you.</p> <p>13 DONALD J. TRUMP: -- for being here.</p> <p>14 It's a very important moment, and a moment</p> <p>15 that means a great deal to me. This month has been</p> <p>16 a wonderful opportunity to celebrate</p> <p>17 African-American history and to begin working</p> <p>18 together to create a better future for African</p> <p>19 Americans and universities and colleges</p> <p>20 and everything that is African American. Today</p> <p>21 we're taking action to help make that future happen</p> <p>22 and that future better.</p> <p>23 Historically Black Colleges and Universities</p> <p>24 are incredibly important institutions woven into</p> <p>25 the fabric of our history just about like no other.</p>
<p style="text-align: right;">Page 58</p> <p>1 MR. PHILLIPS: Sure.</p> <p>2 MR. STONEROCK: Thank you.</p> <p>3 MR. PHILLIPS: We'll be off the record for</p> <p>4 five minutes.</p> <p>5 (Break from 11:09 a.m. to 11:16 a.m.)</p> <p>6 BY MR. PHILLIPS:</p> <p>7 Q Going back to campaign ad number -- I think it</p> <p>8 was 9. We were on this screen. Can you see that</p> <p>9 screen of Donald Trump holding some legislation or an</p> <p>10 executive order?</p> <p>11 A Yes, sir.</p> <p>12 Q Okay. Do you know if -- do you see Omarosa</p> <p>13 pictured there?</p> <p>14 A No, sir.</p> <p>15 Q Okay. The same -- same event. Do you see</p> <p>16 Omarosa pictured there?</p> <p>17 A I can't see everybody's face, but . . .</p> <p>18 Q Let me play it.</p> <p>19 MR. PHILLIPS: And we'll attach this as</p> <p>20 Omarosa Manigault Newman's Exhibit 9B so I don't</p> <p>21 get off of my numbers. I know that's gonna be</p> <p>22 confusing, but it will make sense -- it will make</p> <p>23 it better later on.</p> <p>24 (Respondent's Exhibit 9B was identified and</p> <p>25 later marked for identification.)</p>	<p style="text-align: right;">Page 60</p> <p>1 Church is very important --</p> <p>2 UNKNOWN SPEAKER: Yes.</p> <p>3 DONALD J. TRUMP: -- right? Colleges --</p> <p>4 UNKNOWN SPEAKER: We need our churches.</p> <p>5 DONALD J. TRUMP -- and universities. Come</p> <p>6 here. My -- my defender. He's my defender.</p> <p>7 (Laughter.)</p> <p>8 Education has the power to uplift. It has the</p> <p>9 power to transform. And perhaps most important,</p> <p>10 education has the power to create greater equality</p> <p>11 and justice in our lives. That's why today I'm</p> <p>12 thrilled to be signing an executive order to</p> <p>13 recognize the importance of Historically Black</p> <p>14 College and Universities. Very important. They</p> <p>15 have played such an important role in achieving</p> <p>16 progress for African Americans and in our nation's</p> <p>17 march for justice.</p> <p>18 HBCUs have been, really, pillars of the</p> <p>19 African-American community for more than 150 years.</p> <p>20 Amazing job. And a grand and enduring symbol of</p> <p>21 America at its absolute best. And I congratulate</p> <p>22 you all to say that.</p> <p>23 UNKNOWN SPEAKERS: Thank you.</p> <p>24 DONALD J. TRUMP: With this executive order we</p> <p>25 will make HBCUs a priority of the Whitehouse, an</p>

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1 absolute priority.
 2 UNKNOWN SPEAKER: I'm right there.
 3 UNKNOWN SPEAKER: Yes.
 4 UNKNOWN SPEAKER: That's right.
 5 UNKNOWN SPEAKER: Yeah.
 6 (Applause.)
 7 DONALD J. TRUMP: A lot of people are going to
 8 be angry that they're not a priority, but that's
 9 okay.
 10 (Laughter.)
 11 And we will pledge our support to you, your
 12 mission, and our shared mission of bringing
 13 education and opportunity to all of our people.
 14 And so I just want to congratulate. These are
 15 very, very special people surrounding me. You've
 16 done an amazing job. It's not easy.
 17 UNKNOWN SPEAKER: No.
 18 DONALD J. TRUMP: Nothing's easy.
 19 UNKNOWN SPEAKER: No, it isn't.
 20 DONALD J. TRUMP: You've done an amazing job.
 21 And I just want to congratulate you all.
 22 UNKNOWN SPEAKERS: Thank you.
 23 DONALD J. TRUMP: And I want to thank you --
 24 UNKNOWN SPEAKERS: Thank you very much.
 25 DONALD J. TRUMP: -- on behalf of our country.

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1 UNKNOWN SPEAKERS: Thank you.
 2 UNKNOWN SPEAKER: We thank you.
 3 DONALD J. TRUMP: And I'm gonna sign this.
 4 And this is really fantastic.
 5 UNKNOWN SPEAKER: There it is.
 6 (Applause.)
 7 UNKNOWN SPEAKER: All right.
 8 UNKNOWN SPEAKER: Thank you.
 9 UNKNOWN SPEAKER: Yes.
 10 (End of video.)
 11 BY MR. PHILLIPS:
 12 Q Go back for a second. I believe the gentleman
 13 on the right is Jacksonville's own Nat Glover, former
 14 sheriff. And I'm pretty certain right behind him is
 15 Onarosa Manigault Newman.
 16 So if Onarosa Manigault Newman was at that
 17 event, would you -- would you agree with me that that
 18 was probably -- that -- that -- portions of that
 19 commercial which we're referring to, commercial number
 20 9, were while Onarosa Manigault Newman was still
 21 employed by the Whitehouse?
 22 MR. STONEROCK: Calls for speculation, lacks
 23 foundation.
 24 You can answer if you know, Sean.
 25 THE WITNESS: I do not know her employment at

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1 this moment in this video.
 2 BY MR. PHILLIPS:
 3 Q Okay. Do you agree with me that that's her?
 4 A I cannot see . . .
 5 Q Let me ask her.
 6 MR. PHILLIPS: Ms. Manigault Newman, can you
 7 hear me?
 8 MS. MANIGAULT NEWMAN: Yes, I can hear you.
 9 MR. PHILLIPS: Is that -- is that you behind
 10 Mr. Glover?
 11 MS. MANIGAULT NEWMAN: Yes, that's me. And my
 12 husband is also behind Mr. Glover, John Allen
 13 Newman.
 14 MR. PHILLIPS: Oh, I -- I see John Newman.
 15 Okay. Thank you.
 16 BY MR. PHILLIPS:
 17 Q Do you know who wrote Donald Trump's very
 18 words that he read that day?
 19 MR. STONEROCK: Calls for speculation, lacks
 20 foundation.
 21 THE WITNESS: No, sir. This is not a campaign
 22 event, so I'm unaware.
 23 BY MR. PHILLIPS:
 24 Q Okay. Would you be surprised to learn that
 25 Onarosa Manigault Newman actually wrote the words that

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1 Donald Trump spoke that day that were then featured in
 2 a commercial used to, I guess -- as an antidefamation
 3 campaign? Does that sound like --
 4 MR. STONEROCK: Calls for speculation, lacks
 5 foundation, vague as to antidefamation campaign.
 6 Sean, you can answer if you understand the
 7 question.
 8 THE WITNESS: I would think it's to promote
 9 the legislation.
 10 BY MR. PHILLIPS:
 11 Q Right. Okay. So what was the purpose of
 12 commercial number 9?
 13 A Was that the one we were currently on?
 14 Q Yeah. The -- the -- not the -- not the -- the
 15 clip from the actual bill signing, but this Tony Rankin
 16 commercial. I'll -- I'll play it again.
 17 A Okay.
 18 (Playing video:)
 19 TONY RANKIN: I'm an Army vet, I was homeless,
 20 I was sleeping in my car, and didn't have any hope
 21 for a long time.
 22 VOICEOVER: Then Tony Rankin was offered a
 23 second chance. President Trump's opportunity zones
 24 gave new investments to neglected communities,
 25 and jobs are coming back.

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1 TONY RANKIN: Life is good now. Life is worth
 2 living. The president does want to help people
 3 like myself to be lifted back up in these
 4 low-income communities.
 5 DONALD J. TRUMP: I'm Donald J. Trump and I
 6 approve this message.
 7 (End of video.)
 8 BY MR. PHILLIPS:
 9 Q Did that commercial have anything to do with
 10 Historically Black Colleges and Universities or that
 11 legislation -- that executive order related to HBCUs?
 12 A It --
 13 MR. STONEROCK: Vague as to anything to do
 14 with.
 15 Sorry, Sean. You can answer.
 16 THE WITNESS: No, you can go ahead.
 17 MR. STONEROCK: Calls for speculation --
 18 THE WITNESS: Go for it.
 19 MR. STONEROCK: Calls for speculation, lacks
 20 foundation.
 21 Sorry. Sean, you can answer now.
 22 THE WITNESS: It did not sound like it, sir.
 23 BY MR. PHILLIPS:
 24 Q Isn't it -- I mean, again, we're dealing with
 25 opinions here, but these -- these commercials were all

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1 to show, I guess, Donald Trump wasn't racist or
 2 counteract messaging by Omarosa that he was racist;
 3 correct?
 4 A Yeah, I think these commercials did what you
 5 said. But also to show the legislation that the
 6 president was promoting, but also -- yeah, I think
 7 that's it.
 8 Q Well, including promoting -- legislation he
 9 was promoting while Omarosa Manigault Newman worked
 10 with him.
 11 MR. STONEROCK: Objection, vague
 12 and ambiguous, misstates the videos, misstates the
 13 witness's testimony.
 14 You can answer, Sean.
 15 THE WITNESS: I'm not too sure on the entire
 16 time frame of when Omarosa worked with the
 17 president at the Whitehouse.
 18 BY MR. PHILLIPS:
 19 Q I -- we're only nine through, but why was it
 20 so important -- I mean, I feel like we've got a lot
 21 of -- out of nine, one, two, three, four, five -- five
 22 or six that feature incarcerated African Americans or
 23 formerly incarcerated African Americans. Is that
 24 racist?
 25 A I think the legislation that incarcerated them

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1 was disproportionately affecting that community, so,
 2 yes, I believe that there was some basis of racism
 3 prior to President Trump being in office.
 4 Q Right. But the commercials themselves
 5 targeting African Americans who were involved with the
 6 criminal process, isn't that, I mean,
 7 disproportionately characterizing African Americans as
 8 criminals?
 9 A I don't believe so. I think it -- it's -- the
 10 legislation, like I said before, has disproportionately
 11 targeted African Americans, and that the community has
 12 felt the effects of that legislation. And what we were
 13 trying to do was promote the legislation that President
 14 Trump was trying to get past or sign that would help
 15 other communities that were affected by that
 16 disproportion.
 17 Q Were there other pieces of legislation to
 18 choose from besides the First Step Act that -- that --
 19 that Donald Trump, I guess, enacted, to use your words,
 20 that -- that affected or helped African Americans?
 21 MR. STONEROCK: Calls for speculation, lacks
 22 foundation, misstates his testimony.
 23 You can answer, Sean, if you know.
 24 THE WITNESS: Was there other legislation that
 25 would help the African-American community?

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1 BY MR. PHILLIPS:
 2 Q Yes.
 3 A Oh. Permanently funding HBCUs, I believe that
 4 is primarily the African-American community.
 5 Q Okay.
 6 A Low-income areas that were affected, again,
 7 disproportionately would help the community. So, yes,
 8 I -- I believe there's other legislation besides just
 9 the First Step Act.
 10 Q Do you know what percentage of increase or
 11 decrease Donald Trump got between the 2016 campaign
 12 and the 2020 campaign of African-American vote?
 13 MR. STONEROCK: Calls for speculation, lacks
 14 foundation.
 15 You can answer if you know, Sean.
 16 THE WITNESS: No, sir. That was not part of
 17 my role.
 18 BY MR. PHILLIPS:
 19 Q Okay. So do you know if these -- these
 20 commercials were successful at all?
 21 MR. STONEROCK: Calls for speculation, lacks
 22 foundation, vague as to the term "successful."
 23 You can answer, Sean.
 24 THE WITNESS: The -- again, I was not involved
 25 in polling, so I am -- I am unsure on the effect of

<p style="text-align: right;">Page 69</p> <p>1 the commercials.</p> <p>2 BY MR. PHILLIPS:</p> <p>3 Q Okay. Very good. We'll move on to</p> <p>4 Plaintiff's -- Defendant's 10.</p> <p>5 A And I apologize, I have a trash dumpster being</p> <p>6 dumped outside, so it might get a little loud.</p> <p>7 Q Okay. I can't hear it. But let me know if --</p> <p>8 A Okay.</p> <p>9 Q -- if you need to take a break.</p> <p>10 (Playing video:)</p> <p>11 JESSE JACKSON: Donald Trump for a few minutes</p> <p>12 challenges and opportunities to embrace the</p> <p>13 underserved communities. And beyond that, in terms</p> <p>14 of reaching out and being inclusive, he's done</p> <p>15 that, too. He came to our business meeting here in</p> <p>16 New York because he has this sense of the curious</p> <p>17 and a will to risk to make things better.</p> <p>18 (End of video.)</p> <p>19 (Respondent's Exhibit 10 was identified and</p> <p>20 later marked for identification.)</p> <p>21 BY MR. PHILLIPS:</p> <p>22 Q Do you know where campaign ad 10 aired?</p> <p>23 A No, sir.</p> <p>24 Q Okay. Did Jesse Jackson endorse Donald Trump</p> <p>25 or Joe Biden in the 2020 election?</p>	<p style="text-align: right;">Page 71</p> <p>1 Jennifer Hudson or -- or any other comments on old</p> <p>2 video of Donald Trump and African-American leaders in</p> <p>3 this country?</p> <p>4 MR. STONEROCK: Objection, compound, calls for</p> <p>5 speculation, lacks foundation.</p> <p>6 You can answer if you understand the question,</p> <p>7 Sean.</p> <p>8 THE WITNESS: No, sir, not to my knowledge.</p> <p>9 BY MR. PHILLIPS:</p> <p>10 Q Okay. Fair enough.</p> <p>11 Campaign ad 11.</p> <p>12 (Playing video:)</p> <p>13 DONALD J. TRUMP: Pro family, pro growth, and</p> <p>14 100 percent pro American.</p> <p>15 (End of video.)</p> <p>16 (Respondent's Exhibit 11 was identified and</p> <p>17 later marked for identification.)</p> <p>18 BY MR. PHILLIPS:</p> <p>19 Q Do you know whether -- referring particularly</p> <p>20 to campaign ad number 11, do you know whether any of</p> <p>21 those African Americans featured in that ad were paid,</p> <p>22 compensated?</p> <p>23 A Not to my knowledge, sir.</p> <p>24 Q Okay. Are you aware of whether or not Donald</p> <p>25 J. Trump for President, Inc. paid minorities to either</p>
<p style="text-align: right;">Page 70</p> <p>1 MR. STONEROCK: Calls for speculation, lacks</p> <p>2 foundation.</p> <p>3 You can answer if you know, Sean.</p> <p>4 THE WITNESS: I don't know.</p> <p>5 BY MR. PHILLIPS:</p> <p>6 Q You don't know?</p> <p>7 A No.</p> <p>8 Q Do you know how old that footage was of Jesse</p> <p>9 Jackson?</p> <p>10 MR. STONEROCK: Same objection.</p> <p>11 THE WITNESS: No, sir.</p> <p>12 BY MR. PHILLIPS:</p> <p>13 Q Why Jesse Jackson? Do you know who chose --</p> <p>14 excuse me. Do you know who chose to use old footage of</p> <p>15 Jesse Jackson in that commercial?</p> <p>16 A No, sir.</p> <p>17 Q Do you know Jesse Jackson's current opinion on</p> <p>18 whether or not he believes Donald Trump is a racist?</p> <p>19 MR. STONEROCK: Calls for speculation, lacks</p> <p>20 foundation.</p> <p>21 You can answer it, Sean.</p> <p>22 THE WITNESS: No, sir.</p> <p>23 BY MR. PHILLIPS:</p> <p>24 Q Do you know of any comments Omarosa Manigault</p> <p>25 Newman made about Jesse Jackson or Mohammed Ali or</p>	<p style="text-align: right;">Page 72</p> <p>1 stand behind him at speeches or in commercials, appear</p> <p>2 in commercials?</p> <p>3 A No, sir, not to my knowledge.</p> <p>4 Q Do you know one way or the other?</p> <p>5 A The -- I think you said two questions there at</p> <p>6 once.</p> <p>7 Q Yes. Certainly. I'll break it up.</p> <p>8 Do you know whether the campaign or its agents</p> <p>9 or affiliates ever paid African Americans --</p> <p>10 compensated African Americans to stand behind Trump at</p> <p>11 campaign events?</p> <p>12 A No, sir.</p> <p>13 Q You don't know?</p> <p>14 A No, I am -- I am not aware of any payments to</p> <p>15 African Americans to stand behind President Trump at --</p> <p>16 Q Are you -- are you aware of whether any</p> <p>17 minorities were compensated to appear in television ads</p> <p>18 or -- or Internet ads for Donald Trump?</p> <p>19 A I would believe that using footage of someone</p> <p>20 else, we would by law have to pay that person for the</p> <p>21 individual footage. They cannot just give it to the</p> <p>22 campaign. So that would be yes to that question.</p> <p>23 Q Okay. Do you know if Jesse Jackson was</p> <p>24 compensated for the archival footage of him?</p> <p>25 A No, sir.</p>

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1 Q That would be Exhibit 11. Moving on to
2 Exhibit 12.
3 (Playing video:)
4 DONALD J. TRUMP: Look around at all those
5 empty plants where people have moved down and
6 companies have moved down.
7 (End of video.)
8 (Respondent's Exhibit 12 was identified and
9 later marked for identification.)
10 BY MR. PHILLIPS:
11 Q A 10-second elongated ad, do you know where
12 those would have aired or been used?
13 A Either -- it -- it looks like it would have
14 been an Instagram or a Snapchat. Some digital
15 platform -- right -- social.
16 Q Something on a phone probably.
17 A Correct.
18 Q Okay. 13.
19 (Playing video:)
20 (Music playing with video, no dialogue.)
21 (End of video.)
22 (Respondent's Exhibit 13 was identified and
23 later marked for identification.)
24 BY MR. PHILLIPS:
25 Q Do you know who the gentleman is in campaign

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1 ad 13 with his -- with his thumbs up?
2 A No, sir.
3 Q Okay. Do you know if he was compensated?
4 A No, sir.
5 Q Do you know if he voted for Donald Trump in
6 2020?
7 A No, sir.
8 Q 14.
9 (Playing video:)
10 CORRINE RANKIN: Hey, guys. It's Corrine
11 Rankin. Black Voices for Trump is launching a
12 nationwide grassroots army of supporters to ensure
13 that President Trump is reelected this November,
14 and we need your help. Go online and sign up for
15 Black Voices for Trump to become an official member
16 and to have your voice heard, because together we
17 are going to keep America great.
18 (End of video.)
19 (Respondent's Exhibit 14 was identified and
20 later marked for identification.)
21 BY MR. PHILLIPS:
22 Q Do you know whose decision it was to use #WOKE
23 in campaign ads?
24 A No, sir.
25 Q Okay. Do you know who Corrine Rankin is?

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1 A I've heard the name, but, no, sir, I'm not
2 familiar.
3 Q Was that grassroots support successful?
4 MR. STONEROCK: Objection, calls for
5 speculation, lacks foundation, vague and ambiguous
6 as to successful.
7 You can answer, Sean, if you understand the
8 question.
9 THE WITNESS: I am not confident on whether it
10 is -- was or wasn't successful, and I don't want to
11 assume that.
12 BY MR. PHILLIPS:
13 Q Okay. I guess what was the goal of the ad we
14 just watched?
15 MR. STONEROCK: Calls for speculation, lacks
16 foundation.
17 You can answer, Sean.
18 THE WITNESS: So there's coalitions on a
19 campaign, and each coalition is responsible for
20 helping to drive vote for the president. And I
21 would think that one was for helping to build the
22 Black Voices coalition, and continue to build that
23 group to have more vote or more social network
24 appearances. Like, it -- it -- it's a good way to
25 push message, so . . .

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1 BY MR. PHILLIPS:
2 Q I guess with the ultimate goal of getting
3 Donald Trump reelected with minority support?
4 A The --
5 MR. STONEROCK: Objection, calls for
6 speculation, and lacks foundation.
7 You can answer, Sean.
8 THE WITNESS: I mean, you want the support of
9 all voters.
10 BY MR. PHILLIPS:
11 Q Okay. Well, in 14 ads that -- that were
12 produced to me for your testimony, and they're all
13 featuring -- heavily featuring African Americans,
14 and I'm just -- why?
15 MR. STONEROCK: Objection, asked and answered.
16 You -- you can answer again if you would like,
17 Sean.
18 THE WITNESS: Okay. I mean, it's -- it's a
19 coalition. There -- there's a -- it's a -- more of
20 when you have coalitions you direct the message to
21 individuals and -- and -- and what's important to
22 them to help promote and draw vote for the
23 president.
24 BY MR. PHILLIPS:
25 Q Okay. How does this -- what does this have to

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1 do with Omarosa Manigault Newman?

2 MR. STONEROCK: Objection, asked and answered.

3 You can answer again, Sean.

4 THE WITNESS: Can you rephrase the question?

5 What does what have . . .

6 BY MR. PHILLIPS:

7 Q Yeah. Campaign ad number 14, what does --

8 what does that have to do with, if anything, with

9 Omarosa Manigault Newman?

10 A It's just our -- part of our drive on the

11 coalition to correct a narrative.

12 Q Why are only so far -- I mean, we've got 10

13 more to go. But why are only African Americans

14 featured in ads to correct a narrative about whether

15 Donald Trump's racist?

16 A I didn't --

17 MR. STONEROCK: Calls for speculation, lacks

18 foundation, incomplete hypothetical.

19 You can answer if you know, Sean.

20 THE WITNESS: Now, I didn't create the ads,

21 but my assumption in being -- in being a part of

22 the campaign is you normally would direct ads to

23 the individuals based off of others they associate

24 with. And so when you kind of tailor ads to those

25 individuals, it's just the same as any other

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1 coalition.

2 BY MR. PHILLIPS:

3 Q So I don't want to misstate your words. Black

4 people only associate with black people?

5 A No, that's not what --

6 MR. STONEROCK: Objection, misstates his

7 testimony, argumentative.

8 You can answer, Sean.

9 THE WITNESS: No, sir, that's not what I'm

10 saying.

11 BY MR. PHILLIPS:

12 Q That's why I want to give you a point to

13 clarify because you just said that --

14 A Yes, I realize. Thank you.

15 Q What -- what did you mean by you -- you

16 focused on people that other people are associated

17 with?

18 A Associated with or -- like, if you said

19 someone is racist -- right -- and then you realize that

20 other individuals actually support the president of the

21 same race as you, you would be more in line.

22 Like, if you were African American and only

23 seeing white people on ads, how does that correct the

24 president and that narrative of being racist?

25 Q But -- I mean -- so I guess it was the

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1 campaign strategy to use race-driven messages to

2 counteract a racist narrative?

3 MR. STONEROCK: Objection, misstates the

4 testimony, argumentative, vague and ambiguous,

5 lacks foundation, calls for speculation.

6 You can answer, Sean, if you understand.

7 THE WITNESS: And I apologize, John, can

8 you -- not rephrase it, just restate it for me?

9 BY MR. PHILLIPS:

10 Q Yes. Sure. I'm just -- I'm -- I'm -- I

11 imagine -- I'm a -- I'm a white guy. Okay? White

12 people -- a lot of white people don't like racists

13 either; right?

14 MR. STONEROCK: Objection, relevance, calls

15 for speculation, lacks foundation, incomplete

16 hypothetical.

17 You can answer, Sean, if you understand.

18 THE WITNESS: Yeah, I agree.

19 BY MR. PHILLIPS:

20 Q Okay. So why target only African Americans

21 with this campaign?

22 MR. STONEROCK: Objection, misstates his

23 testimony.

24 THE WITNESS: That would -- that would assume

25 that the messaging is only going out to African

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1 Americans; correct? I mean, like you said, white

2 people also don't like -- or I individually don't

3 like racism. I believe that the majority of white

4 people don't like racism. And it would go to

5 everybody -- right --

6 BY MR. PHILLIPS:

7 Q Okay.

8 A -- not just individuals based on race.

9 Q Do you know how long there's been a narrative

10 that Donald Trump was racist?

11 MR. STONEROCK: Calls for speculation, lacks

12 foundation.

13 THE WITNESS: No, sir.

14 BY MR. PHILLIPS:

15 Q 15, let's move on to 15, which will be Exhibit

16 15.

17 (Playing video:)

18 PARIS DENNARD: Hey, this is Paris Dennard.

19 Black Voices for Trump is building a grassroots

20 coalition of leaders from all across the country,

21 and we need your help. We need you to sign up

22 today to join Black Voices for Trump so you can

23 help us ensure that President Trump is reelected in

24 November. Let your voice be heard. Sign up today.

25 Let's do it together.

<p style="text-align: right;">Page 81</p> <p>1 (End of video.)</p> <p>2 (Respondent's Exhibit 15 was identified and</p> <p>3 later marked for identification.)</p> <p>4 BY MR. PHILLIPS:</p> <p>5 Q Are you familiar with Mr. Dennard?</p> <p>6 A No, sir.</p> <p>7 Q Okay. I think starting with campaign ad 16,</p> <p>8 which will be Defendant's 16, we get into the sexism</p> <p>9 issues. Let me see if I'm right. This will be</p> <p>10 Defendant's 16.</p> <p>11 (Playing video:)</p> <p>12 DR. GINA LOUDON: Hey, it's Dr. Gina Loudon</p> <p>13 with Women for Trump. We need your support now</p> <p>14 more than ever to help President Donald Trump win</p> <p>15 reelection this November and to continue fighting</p> <p>16 for the issues that matter most to us, to women.</p> <p>17 Click below to sign up to join the movement. Let</p> <p>18 your voice be heard.</p> <p>19 (End of video.)</p> <p>20 (Respondent's Exhibit 16 was identified and</p> <p>21 later marked for identification.)</p> <p>22 BY MR. PHILLIPS:</p> <p>23 Q So tell me about -- tell me about -- do you</p> <p>24 know where that ad was aired?</p> <p>25 A It looks like a digital ad.</p>	<p style="text-align: right;">Page 83</p> <p>1 THE WITNESS: Because it was during a 2016</p> <p>2 presidential election.</p> <p>3 BY MR. PHILLIPS:</p> <p>4 Q Okay.</p> <p>5 (Playing video:)</p> <p>6 BILLY BUSH: She used to be great. But she's</p> <p>7 still very beautiful.</p> <p>8 DONALD J. TRUMP: I moved on her, actually.</p> <p>9 You know, she was down in Palm Beach. I moved on</p> <p>10 her, and I failed. I'll admit it.</p> <p>11 BILLY BUSH: Whoa.</p> <p>12 DONALD J. TRUMP: I did try and f*** her. She</p> <p>13 was married.</p> <p>14 BILLY BUSH: (Inaudible.)</p> <p>15 DONALD J. TRUMP: Oh, no, Nancy.</p> <p>16 UNKNOWN SPEAKER: Yeah.</p> <p>17 DONALD J. TRUMP: No, this was (Inaudible.)</p> <p>18 And I moved on her very heavily. In fact, I took</p> <p>19 her out furniture shopping. She wanted to get some</p> <p>20 furniture. I said: I'll show you where they have</p> <p>21 some nice furniture. I took her out for furniture.</p> <p>22 I moved on her like a bitch, but I couldn't get</p> <p>23 there. And she was married. And all of a sudden I</p> <p>24 see her, and she's now got the big phony **** and</p> <p>25 everything. She's totally changed her look.</p>
<p style="text-align: right;">Page 82</p> <p>1 Q Okay. And why -- why was that ad aired?</p> <p>2 A Dr. Loudon is on -- on Fox a lot. I think</p> <p>3 she's a well-known person. So trying to build a</p> <p>4 coalition of women for Trump.</p> <p>5 Q And why is that in any way relevant to Omarosa</p> <p>6 Manigault Newman?</p> <p>7 A Because of her public statements of saying</p> <p>8 that the president is sexist.</p> <p>9 Q Okay. Let's go to a different video, which</p> <p>10 we'll label as 16B. Are you familiar with the Access</p> <p>11 Hollywood tape?</p> <p>12 A Yes, sir.</p> <p>13 Q What happened there?</p> <p>14 MR. STONEROCK: Objection, vague</p> <p>15 and ambiguous, calls for speculation, lacks</p> <p>16 foundation.</p> <p>17 You can answer if you understand the question,</p> <p>18 Sean.</p> <p>19 THE WITNESS: There was recordings that were</p> <p>20 given to the news networks.</p> <p>21 BY MR. PHILLIPS:</p> <p>22 Q Why did that -- why is that significant?</p> <p>23 MR. STONEROCK: Objection, vague as to</p> <p>24 significant.</p> <p>25 You can answer if you know, Sean.</p>	<p style="text-align: right;">Page 84</p> <p>1 BILLY BUSH: She's your girl's ****. Hottie,</p> <p>2 in the purple.</p> <p>3 DONALD J. TRUMP: Whoa.</p> <p>4 UNKNOWN SPEAKER: Whoa.</p> <p>5 BILLY BUSH: Yes.</p> <p>6 DONALD J. TRUMP: Whoa.</p> <p>7 BILLY BUSH: Yes, The Donald is good.</p> <p>8 DONALD J. TRUMP: Whoa.</p> <p>9 BILLY BUSH: Oh, my man.</p> <p>10 UNKNOWN SPEAKER: Yes.</p> <p>11 BILLY BUSH: Wait, wait. You've got to look</p> <p>12 at me when you get out there.</p> <p>13 UNKNOWN SPEAKER: Who sets this up?</p> <p>14 BILLY BUSH: You give me the thumbs up.</p> <p>15 DONALD J. TRUMP: You are a ****.</p> <p>16 BILLY BUSH: Give me the thumbs up. You've</p> <p>17 got to give the thumbs up.</p> <p>18 UNKNOWN SPEAKER: You can't be too happy, man.</p> <p>19 UNKNOWN SPEAKER: You've got to give the</p> <p>20 thumbs up.</p> <p>21 DONALD J. TRUMP: Yeah, you and I will walk</p> <p>22 out.</p> <p>23 UNKNOWN SPEAKER: Oh, my God, is she hot.</p> <p>24 DONALD J. TRUMP: Maybe it's a different one.</p> <p>25 BILLY BUSH: It better not be the publicist.</p>

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1 No, it's -- it's her.
 2 DONALD J. TRUMP: Yeah, that's her, with the
 3 gold.
 4 I'm gonna use some tic tacs just in case I
 5 start kissing her. You know, I'm automatically
 6 attracted to beautiful women. I just start kissing
 7 them. It's like a magnet, kiss, kiss. I don't
 8 even wait. And when you're a star, they let you do
 9 it. You can do anything.
 10 BILLY BUSH: You can do whatever you want.
 11 DONALD J. TRUMP: You grab them by the *****,
 12 You can do anything.
 13 BILLY BUSH: Look at those legs. All I can
 14 see is the legs.
 15 DONALD J. TRUMP: No, it looks good.
 16 BILLY BUSH: Come on, shorty --
 17 DONALD J. TRUMP: Oh, nice legs, huh?
 18 BILLY BUSH: -- oof, get out of the way.
 19 There's some good legs.
 20 Go ahead.
 21 DONALD J. TRUMP: It's always good if you
 22 don't fall out of the bus like Ford, Gerald Ford.
 23 Remember?
 24 BILLY BUSH: Down below. Down below. Pull
 25 the handle.

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1 DONALD J. TRUMP: Hello. How are you? Hi.
 2 ARIANNA: Hi, Mr. Trump. How are you?
 3 DONALD J. TRUMP: Good seeing you. Terrific.
 4 ARIANNA: Good to see you, too.
 5 DONALD J. TRUMP: Terrific. You know Billy
 6 Bush.
 7 ARIANNA: How are you?
 8 BILLY BUSH: Nice to see you. How are you
 9 doing, Arianne?
 10 ARIANNA: I'm doing very well. Thank you.
 11 Are you ready to be a soap star?
 12 DONALD J. TRUMP: We're ready. Let's go.
 13 ARIANNA: All right.
 14 DONALD J. TRUMP: Make me a soap star.
 15 ARIANNA: All right.
 16 BILLY BUSH: How about a little hug for The
 17 Donald? He just got off the bus.
 18 ARIANNA: Would you like a little hug,
 19 darling?
 20 DONALD J. BUSH: Oh, yes. Absolutely.
 21 Melania said this was okay.
 22 BILLY BUSH: How about a hug for Bushy? I
 23 just got off the bus.
 24 ARIANNA: Oh, Bushy, Bushy.
 25 BILLY BUSH: There we go. Excellent.

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1 DONALD J. TRUMP: Come on.
 2 BILLY BUSH: Well, you've got a nice costar
 3 here.
 4 DONALD J. TRUMP: Good.
 5 ARIANNA: Yes. Absolutely.
 6 DONALD J. TRUMP: After you.
 7 ARIANNA: All right. I think we're gonna
 8 sneak on this way, through Jay Leno.
 9 DONALD J. TRUMP: Okay.
 10 BILLY BUSH: Arianna, are there any -- any
 11 love scenes or anything in the show?
 12 ARIANNA: Today there's a lot of begging from
 13 me.
 14 BILLY BUSH: Really?
 15 ARIANNA: Yes.
 16 BILLY BUSH: You're gonna beg him for
 17 attention, for an apprenticeship, or --
 18 ARIANNA: To get married.
 19 BILLY BUSH: To get married.
 20 DONALD J. TRUMP: Ah, that's what it is.
 21 BILLY BUSH: Oh, no.
 22 ARIANNA: How do you feel about that?
 23 DONALD J. TRUMP: That's okay. I have to look
 24 at a script.
 25 ARIANNA: Yes. Oh.

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1 DONALD J. TRUMP: Have you studied this
 2 script?
 3 ARIANNA: Well, luckily, I have -- actually,
 4 we're going to continue going this way.
 5 DONALD J. TRUMP: Do you have a script for me?
 6 ARIANNA: I've got a script for you.
 7 DONALD J. TRUMP: Okay. Good.
 8 ARIANNA: And, luckily, I do all the talking.
 9 So --
 10 DONALD J. TRUMP: Oh, good.
 11 ARIANNA: -- you just stand there and look
 12 handsome and you'll be good.
 13 DONALD J. TRUMP: Well, that's good.
 14 (End of video.)
 15 (Respondent's Exhibit 16B was identified and
 16 later marked for identification.)
 17 BY MR. PHILLIPS:
 18 Q We'll cut that off at 249.
 19 Were these comments of -- I mean, would it --
 20 going back to what's fact and what's opinion. Someone
 21 saying "I moved on her like a bitch," is -- is that
 22 sexist?
 23 MR. STONEROCK: Objection, incomplete
 24 hypothetical, calls for speculation, calls for a
 25 legal conclusion.

<p style="text-align: right;">Page 89</p> <p>1 You can answer, Sean, if you have an opinion.</p> <p>2 THE WITNESS: I actually don't have an opinion</p> <p>3 on it. I don't -- I don't believe it is. But I</p> <p>4 also -- yeah, I don't believe it is.</p> <p>5 BY MR. PHILLIPS:</p> <p>6 Q When you're a star you can do anything, grab</p> <p>7 them by the pussy. A comment like that, is that</p> <p>8 sexist?</p> <p>9 MR. STONEROCK: Objection, calls for</p> <p>10 speculation, lacks foundation, incomplete</p> <p>11 hypothetical, calls for a legal conclusion.</p> <p>12 You can answer it, Sean, if you have an</p> <p>13 opinion on it.</p> <p>14 THE WITNESS: I don't have an opinion.</p> <p>15 BY MR. PHILLIPS:</p> <p>16 Q Okay. And what did Omarosa say that was --</p> <p>17 that -- that attributed Donald Trump to being sexist?</p> <p>18 MR. STONEROCK: Objection, calls for</p> <p>19 speculation, lacks foundation.</p> <p>20 Sean, you can -- you can testify to statements</p> <p>21 you recall off the top of your head. Obviously</p> <p>22 there's hundreds of them at issue in the case.</p> <p>23 THE WITNESS: I have -- I have no statements</p> <p>24 off the top of my head. But there are -- there are</p> <p>25 multiple occasions.</p>	<p style="text-align: right;">Page 91</p> <p>1 A I would say -- I don't know how to say it the</p> <p>2 best way, but not hating but probably -- yeah, probably</p> <p>3 hating someone else based off of their gender.</p> <p>4 Q Hating someone else?</p> <p>5 A It's a strong word. I think it's -- it could</p> <p>6 be multiple things. But basing it on the opinion of</p> <p>7 gender.</p> <p>8 Q Okay. Are we allowed in this country to grab</p> <p>9 a woman by the private parts --</p> <p>10 MR. STONEROCK: Objection, incomplete</p> <p>11 hypothetical --</p> <p>12 BY MR. PHILLIPS:</p> <p>13 Q -- without consent?</p> <p>14 MR. STONEROCK: Objection, incomplete</p> <p>15 hypothetical, calls for a legal conclusion, calls</p> <p>16 for speculation, lacks foundation.</p> <p>17 I'm gonna instruct the witness not to answer</p> <p>18 the question.</p> <p>19 MR. PHILLIPS: Okay.</p> <p>20 BY MR. PHILLIPS:</p> <p>21 Q Let's go to another video, which we'll label</p> <p>22 16C.</p> <p>23 (Playing video:)</p> <p>24 HOWARD STERN: Donald, do you ever discuss sex</p> <p>25 with your daughter?</p>
<p style="text-align: right;">Page 90</p> <p>1 BY MR. PHILLIPS:</p> <p>2 Q Okay. And is it a matter of fact that Donald</p> <p>3 Trump's not sexist, or is that opinion?</p> <p>4 MR. STONEROCK: Objection, calls for a legal</p> <p>5 conclusion, vague and ambiguous.</p> <p>6 You can answer if you understand the question,</p> <p>7 Sean.</p> <p>8 THE WITNESS: No, I don't. I think that -- of</p> <p>9 what you -- can you rephrase it?</p> <p>10 BY MR. PHILLIPS:</p> <p>11 Q Yeah.</p> <p>12 A I couldn't figure it out.</p> <p>13 Q So part of this campaign was -- and, I guess,</p> <p>14 part of the reason that -- that Omarosa is being sued</p> <p>15 by the campaign is because she said or insinuated or</p> <p>16 gave examples of Don -- Donald Trump being what you --</p> <p>17 you said was sexist. And what I'm -- what I'm</p> <p>18 wondering is, is -- well, let me back it up, then.</p> <p>19 What is -- what is sexist? What does that</p> <p>20 mean?</p> <p>21 A I think it was the same line of racism except</p> <p>22 for it goes with someone's gender.</p> <p>23 Q Well, race and -- race and sex and gender are</p> <p>24 two separate things. So what is -- help me understand</p> <p>25 your definition of sexism, please.</p>	<p style="text-align: right;">Page 92</p> <p>1 DONALD J. TRUMP: No.</p> <p>2 HOWARD STERN: You do not?</p> <p>3 DONALD J. TRUMP: No.</p> <p>4 HOWARD STERN: You've never sat her down --</p> <p>5 IVANKA TRUMP: And I have a feeling we're not</p> <p>6 going to here.</p> <p>7 VOICEOVER: Another embarrassing video from a</p> <p>8 2006 Howard Stern show has surfaced. It shows</p> <p>9 Trump, alongside daughter, Ivanka, and son, Don,</p> <p>10 Jr., joking about being a sexual predator.</p> <p>11 HOWARD STERN: You know about sexual predators</p> <p>12 and things like that.</p> <p>13 UNKNOWN SPEAKER: Right.</p> <p>14 HOWARD STERN: I mean --</p> <p>15 ROBIN QUIVERS: You are one.</p> <p>16 HOWARD STERN: All right. I wasn't going to</p> <p>17 say that. But it's true.</p> <p>18 (End of video.)</p> <p>19 (Respondent's Exhibit 16C was identified and</p> <p>20 later marked for identification.)</p> <p>21 BY MR. PHILLIPS:</p> <p>22 Q Is -- and I realize Howard Stern's a comedy</p> <p>23 show, but is -- in today's society, is laughing about</p> <p>24 being called a sexual predator appropriate?</p> <p>25 MR. STONEROCK: Objection, incomplete</p>

<p style="text-align: right;">Page 93</p> <p>1 hypothetical, misstates the video, calls for 2 speculation, lacks foundation, vague and ambiguous 3 as to the term "appropriate." 4 You can answer if you understand the question, 5 Sean. 6 THE WITNESS: I believe that in context of 7 that I would say it's probably because it is a 8 comedy show. And it was a long time ago. During 9 those times, I don't think it was frowned upon as 10 it is today. 11 BY MR. PHILLIPS: 12 Q Okay. We'll go on to 16D. 13 (Playing video:) 14 DONALD J. TRUMP: My daughter is beautiful, 15 Ivanka. She -- she -- 16 HOWARD STERN: By the way, your daughter -- 17 DONALD J. TRUMP: She's beautiful. 18 HOWARD STERN: -- is a piece -- can I say 19 this? A piece of ass. 20 DONALD J. TRUMP: Yeah. 21 The last couple years I'd go out with 22 somebody, and she's, like, 21, and she's talking 23 about, you know, what are you doing, and she's 24 studying algebra and -- 25 HOWARD STERN: So what?</p>	<p style="text-align: right;">Page 95</p> <p>1 them comes up to you and says: Mr. Trump, you're a 2 very sexy man. 3 DONALD J. TRUMP: You're a beautiful man. You 4 have fantastic hair. 5 HOWARD STERN: Well, you're a powerful man. 6 Right? Right? 7 DONALD J. TRUMP: Right. 8 HOWARD STERN: You're a powerful man. 9 DONALD J. TRUMP: Right. 10 HOWARD STERN: I want to sleep with you. Now, 11 you're not the type that would say no. 12 DONALD J. TRUMP: I -- I don't want to hurt 13 their feelings. 14 HOWARD STERN: Right. No. 15 DONALD J. TRUMP: Right. 16 HOWARD STERN: But, I mean, you see a 17 beautiful woman -- 18 DONALD J. TRUMP: Right. 19 HOWARD STERN: -- you want to -- you want to 20 have that. You're a guy that likes to have 21 everything. Right? 22 ROBIN QUIVERS: Well, couldn't that be 23 construed, however, as um . . . 24 HOWARD STERN: Conflict? 25 ROBIN QUIVERS: Yes.</p>
<p style="text-align: right;">Page 94</p> <p>1 DONALD J. TRUMP: And it's, like -- it was 2 always embarrassing for me to walk in. It's too 3 young. 30 is like a perfect age. 4 HOWARD STERN: Absolutely. She has enough 5 life experience. 6 ARTIE LANGE: Until she's 35. 7 HOWARD STERN: Yeah. 8 (Laughter.) 9 ROBIN QUIVERS: Don't ever change. 10 HOWARD STERN: Too much life experience. 11 DONALD J. TRUMP: What is it at 35, Howard? 12 It's called checkout time. 13 HOWARD STERN: And you're probably, I would 14 say, the greatest judge of beauty on this planet. 15 In fact, I would create a TV show for you where all 16 you did was just judge women. 17 DONALD J. TRUMP: Now, that may be the best 18 idea of all. 19 HOWARD STERN: It's a simple thing. It's a 20 half hour, and we strip it out all over the 21 country. 22 DONALD J. TRUMP: No, I would say I'm the 23 all-time judge. 24 HOWARD STERN: You own this pageant. You go 25 over, you look, you're meeting the girls. One of</p>	<p style="text-align: right;">Page 96</p> <p>1 HOWARD STERN: I don't -- I don't see it as a 2 conflict. 3 DONALD J. TRUMP: Well, it could be a conflict 4 of interest. But, you know, it's the kind of thing 5 you worry about later. 6 ROBIN QUIVERS: Oh, I see. 7 DONALD J. TRUMP: You tend to think about the 8 conflict a little bit later on. 9 ARTIE LANGE: The question is how could it not 10 be construed? 11 HOWARD STERN: No. I mean -- I mean, some of 12 these foreign girls, you know: Mr. Trump, in my 13 country we say hello with the vagina. And then -- 14 DONALD J. TRUMP: Well, you could also say: 15 As the owner of the pageant, it's your obligation 16 to do that. 17 HOWARD STERN: So -- so you have done that. 18 Now, tell me -- 19 DONALD J. TRUMP: Well, I'll tell you the 20 funniest is that I'll go backstage before a show. 21 HOWARD STERN: Yes. 22 DONALD J. TRUMP: And everyone's getting 23 dressed and ready and everything else. And, you 24 know, no men are anywhere. And I'm allowed to go 25 in because I'm the owner of the pageant, and</p>

<p style="text-align: right;">Page 97</p> <p>1 therefore I'm inspecting it. You know, I'm</p> <p>2 inspecting --</p> <p>3 ROBIN QUIVERS: Right, right.</p> <p>4 DONALD J. TRUMP: -- and I want to make sure</p> <p>5 that everything is good.</p> <p>6 HOWARD STERN: You're like a doctor. You're</p> <p>7 there --</p> <p>8 DONALD J. TRUMP: And they're dressing. Is</p> <p>9 everyone okay? You know, they're standing there</p> <p>10 with no clothes. Is everybody okay? And you see</p> <p>11 these incredible looking women. And so I sort of</p> <p>12 get away with things like that.</p> <p>13 (End of video.)</p> <p>14 (Respondent's Exhibit 16D was identified and</p> <p>15 later marked for identification.)</p> <p>16 BY MR. PHILLIPS:</p> <p>17 Q Is -- you're referring to 16D, the CNN clip.</p> <p>18 Is calling a woman a piece of ass sexist?</p> <p>19 MR. STONEROCK: Objection, calls for</p> <p>20 speculation, lacks foundation, incomplete</p> <p>21 hypothetical.</p> <p>22 You can answer, Sean, if you have an opinion.</p> <p>23 THE WITNESS: I don't have an opinion on that.</p> <p>24 BY MR. PHILLIPS:</p> <p>25 Q Okay. And we'll go to 16E.</p>	<p style="text-align: right;">Page 99</p> <p>1 do you have a reason to dispute that that was him</p> <p>2 speaking?</p> <p>3 A I don't know if it was or wasn't, but I</p> <p>4 wouldn't . . .</p> <p>5 Q Okay.</p> <p>6 A I don't want to assume. Also, I've never --</p> <p>7 the Howard Stern Show is definitely different.</p> <p>8 Q And we will go to an old clip from The View.</p> <p>9 It's fairly short.</p> <p>10 (Playing video:)</p> <p>11 SHERRI SHEPHERD: Hey. So, Donald . . .</p> <p>12 DONALD J. TRUMP: Hmm?</p> <p>13 SHERRI SHEPHERD: All right. I'm -- I'm</p> <p>14 afraid to ask this question, but what would you do</p> <p>15 if Playboy put Ivanka on the cover of the magazine</p> <p>16 and she had not --</p> <p>17 IVANKA TRUMP: This is going to be an</p> <p>18 interesting answer.</p> <p>19 SHERRI SHEPHERD: Uh-huh. See, he doesn't</p> <p>20 even want you to have a drink. I know him,</p> <p>21 so . . .</p> <p>22 DONALD J. TRUMP: It would be really</p> <p>23 disappointing. Not really. But it would depend on</p> <p>24 what was inside the magazine.</p> <p>25 SHERRI SHEPHERD: And now, if she posed, it</p>
<p style="text-align: right;">Page 98</p> <p>1 A Is there a way -- sorry to interrupt you real</p> <p>2 quick. Is there a way to see the dates? Because it</p> <p>3 looked -- it sounded like multiple different videos all</p> <p>4 pulled together as one on that clip.</p> <p>5 Q That -- that video was procured by CNN, and it</p> <p>6 -- it had the dates in it when each clip occurred.</p> <p>7 A Where were they?</p> <p>8 Q Okay. Let me go back to that one.</p> <p>9 A And when -- and when -- when did CNN put these</p> <p>10 out, you know?</p> <p>11 Q Yeah. That's a good question.</p> <p>12 A Sorry, again, about the noise --</p> <p>13 Q That's fine.</p> <p>14 A -- if you can hear it.</p> <p>15 Q All right. So going back to 16E [sic]. You</p> <p>16 can see the CNN logo. And then they have various clips</p> <p>17 from the Howard Stern Show, 2002, 2010, 2005, and then</p> <p>18 the CNN logo to close. So I believe this came out</p> <p>19 during one of the campaigns.</p> <p>20 Do you dispute that Donald Trump said those</p> <p>21 things?</p> <p>22 MR. STONEROCK: Objection, vague as to said</p> <p>23 those things.</p> <p>24 BY MR. PHILLIPS:</p> <p>25 Q Yeah. The clips from Donald Trump speaking,</p>	<p style="text-align: right;">Page 100</p> <p>1 would be fine. But if they put her picture on --</p> <p>2 DONALD J. TRUMP: Yeah. But it depends on</p> <p>3 what goes inside the magazine.</p> <p>4 JOY BEHAR: Well, see, that's her gripe.</p> <p>5 DONALD J. TRUMP: Right.</p> <p>6 JOY BEHAR: That's this girl's gripe.</p> <p>7 DONALD J. TRUMP: And there was nothing.</p> <p>8 JOY BEHAR: And you assume there will be nude</p> <p>9 -- nude photos.</p> <p>10 DONALD J. TRUMP: Right, you do assume that in</p> <p>11 Playboy.</p> <p>12 ELISABETH HASSELBECK: Misleading.</p> <p>13 MEREDITH VIEIRA: Okay. But if they were, you</p> <p>14 wouldn't have an issue with it, then? If they were</p> <p>15 using her to --</p> <p>16 DONALD J. TRUMP: I don't think Ivanka would</p> <p>17 do that inside the magazine, although she does have</p> <p>18 a very nice figure. I've said that if Ivanka</p> <p>19 weren't my daughter, perhaps I would be dating her,</p> <p>20 you know.</p> <p>21 JOY BEHAR: Stop it. Oh, it's so weird.</p> <p>22 Stop it.</p> <p>23 MEREDITH VIEIRA: You know what, you are --</p> <p>24 DONALD J. TRUMP: Is that terrible? How</p> <p>25 terrible?</p>

<p style="text-align: right;">Page 101</p> <p>1 MEREDITH VIEIRA: You're known for saying --</p> <p>2 DONALD J. TRUMP: Is that terrible?</p> <p>3 MEREDITH VIEIRA: -- outrageous things,</p> <p>4 Mr. Trump.</p> <p>5 JOY BEHAR: Who are you, Woody Allen?</p> <p>6 (Laughter and applause.)</p> <p>7 DONALD J. TRUMP: That's good. That's very</p> <p>8 good.</p> <p>9 (End of video.)</p> <p>10 (Respondent's Exhibit 16E was identified and</p> <p>11 later marked for identification.)</p> <p>12 BY MR. PHILLIPS:</p> <p>13 Q I know when we get into Omarosa comments,</p> <p>14 there's some comments related to things that Omarosa</p> <p>15 said about the relationship between Donald Trump</p> <p>16 and Ivanka. And I guess the question is would you</p> <p>17 agree that there's been a -- someone could have a</p> <p>18 long-standing opinion that Donald Trump has said things</p> <p>19 that most fathers probably wouldn't say about their</p> <p>20 daughters such that: If she wasn't my daughter, I</p> <p>21 would be dating her?</p> <p>22 MR. STONEROCK: Objection, incomplete</p> <p>23 hypothetical, calls for speculation, lacks</p> <p>24 foundation, vague and ambiguous as to long-standing</p> <p>25 opinion.</p>	<p style="text-align: right;">Page 103</p> <p>1 So we'll substitute 16F with a different</p> <p>2 Howard Stern clip. I think that's the CNN clip.</p> <p>3 Okay. Well, let me stop at D. We'll strike F. I</p> <p>4 might do that later.</p> <p>5 BY MR. PHILLIPS:</p> <p>6 Q And I guess -- I guess my question after those</p> <p>7 few videos is, is it a fact or an opinion that Donald</p> <p>8 Trump is sexist?</p> <p>9 MR. STONEROCK: Objection, calls for a legal</p> <p>10 conclusion, incomplete hypothetical.</p> <p>11 You can answer if you have an opinion on that.</p> <p>12 THE WITNESS: I -- I don't believe that Donald</p> <p>13 Trump is sexist. I would think that would be</p> <p>14 opinion based.</p> <p>15 BY MR. PHILLIPS:</p> <p>16 Q Okay. Does saying sexist -- do you not feel</p> <p>17 that any of those comments you just saw were sexist?</p> <p>18 A I don't -- I don't have an opinion on whether</p> <p>19 they were or were not sexist.</p> <p>20 Q Okay. We will go to video 17.</p> <p>21 MR. STONEROCK: John, before we get into that</p> <p>22 video, could we take another quick break? I've got</p> <p>23 to send a quick email on another matter.</p> <p>24 MR. PHILLIPS: Sure.</p> <p>25 MR. STONEROCK: Could I have 10 minutes?</p>
<p style="text-align: right;">Page 102</p> <p>1 You can answer if you understand the question,</p> <p>2 Sean.</p> <p>3 THE WITNESS: Can you say that again, sir? It</p> <p>4 sounded more of a statement than a question.</p> <p>5 BY MR. PHILLIPS:</p> <p>6 Q Yes. Are you aware that there's been a</p> <p>7 long-standing narrative that Donald Trump refers to his</p> <p>8 daughter, Ivanka Trump, in sexual terms?</p> <p>9 MR. STONEROCK: Vague and ambiguous as to</p> <p>10 long-standing narrative.</p> <p>11 You can answer, Sean.</p> <p>12 THE WITNESS: I'm -- to be honest with you, I</p> <p>13 was not too familiar with Mr. Trump until the</p> <p>14 campaign.</p> <p>15 BY MR. PHILLIPS:</p> <p>16 Q Okay. And that was 16E.</p> <p>17 MR. STONEROCK: I think -- John, was that E or</p> <p>18 -- was that E, the last one you played?</p> <p>19 MR. PHILLIPS: I believe it was E. I have B</p> <p>20 as Access Hollywood, C as Inside Edition, D as CNN,</p> <p>21 and E as View.</p> <p>22 MR. STONEROCK: Okay.</p> <p>23 MR. PHILLIPS: We're going to do one more of</p> <p>24 these, F, which will be Howard Stern. Oh, maybe</p> <p>25 not. The audio didn't come down on that one.</p>	<p style="text-align: right;">Page 104</p> <p>1 MR. PHILLIPS: Sure.</p> <p>2 MR. STONEROCK: And we can come back at, say,</p> <p>3 9 -- 12:20 your time and 9:20 our time?</p> <p>4 MR. PHILLIPS: Sure.</p> <p>5 MR. STONEROCK: Okay. Thank you.</p> <p>6 (Break from 12:09 p.m. to 12:24 p.m.)</p> <p>7 MR. PHILLIPS: Back on the record at 12:24</p> <p>8 with Omarosa Manigault Newman's Exhibit 17, another</p> <p>9 video produced to us.</p> <p>10 (Playing video:)</p> <p>11 KATRINA CAMPINS: Hi, everyone. Katrina</p> <p>12 Campins here. Women for Trump is building a</p> <p>13 grassroots army of women across the nation who are</p> <p>14 dedicated to making sure that President Trump is</p> <p>15 reelected this November, and we need your help.</p> <p>16 Click below to sign up and let your voice be heard.</p> <p>17 Together we will keep America great.</p> <p>18 (End of video.)</p> <p>19 (Respondent's Exhibit 17 was identified and</p> <p>20 later marked for identification.)</p> <p>21 BY MR. PHILLIPS:</p> <p>22 Q Mr. Dollman, I'm gonna use the terms generally</p> <p>23 versus specifically for this -- this next question.</p> <p>24 A Okay.</p> <p>25 Q Was ad number 17 created specifically because</p>

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1 of Omarosa Manigault Newman or generally because of
2 Omarosa Manigault Newman? Or you can reject that
3 entirely and answer what Omarosa Manigault Newman had
4 to do with -- with 17.

5 MR. STONEROCK: Objection, vague and ambiguous
6 as to generally and specifically.

7 Sean, you can answer the question.

8 THE WITNESS: I think it was generally putting
9 the women coalition together.

10 BY MR. PHILLIPS:

11 Q Okay. Would you agree that the women
12 coalition was needed as a matter of damage control from
13 tapes like the Access Hollywood tape?

14 MR. STONEROCK: Objection, incomplete
15 hypothetical, calls for speculation, lacks
16 foundation.

17 You can answer, Sean.

18 THE WITNESS: I believe every campaign has a
19 women's coalition.

20 BY MR. PHILLIPS:

21 Q Okay. Does every woman's campaign -- I'm
22 sorry. Does every campaign have a candidate who uses
23 terms like "moved on her like a bitch" or "grab them by
24 the pussy"?

25 MR. STONEROCK: Objection, incomplete

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1 hypothetical, argumentative.

2 You can answer it, Sean.

3 THE WITNESS: I do not know, sir.

4 (J. Wyndal Gordon, Esquire entered the Zoom
5 deposition.)

6 BY MR. PHILLIPS:

7 Q Okay. Have you ever heard of a political
8 campaign where the chief -- the chief candidate uses
9 terms that are made public such as "I moved on her like
10 a bitch" or "you grab them by the pussy"?

11 MR. STONEROCK: Objection, compound,
12 incomplete hypothetical, calls for speculation,
13 lacks foundation.

14 You can answer, Sean.

15 THE WITNESS: I'm unsure, sir.

16 BY MR. PHILLIPS:

17 Q Okay. Abraham Lincoln, did -- was he ever
18 attributed to a quote about moving on women like a
19 bitch?

20 MR. STONEROCK: Same objections.

21 THE WITNESS: I -- I do not know, sir.

22 BY MR. PHILLIPS:

23 Q Barack Obama, did he ever talk about grabbing
24 a woman by the pussy that you're aware of --

25 MR. STONEROCK: Same objections.

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1 BY MR. PHILLIPS:

2 Q -- publicly?

3 THE WITNESS: Not that I'm aware of.

4 BY MR. PHILLIPS:

5 Q Okay. Any candidate in American history joke
6 about sexual assault or sexual predatory behavior that
7 you're aware of --

8 MR. STONEROCK: Objection, calls for
9 speculation, lacks foundation.

10 You can answer, Sean.

11 BY MR. PHILLIPS:

12 Q -- besides Donald Trump?

13 THE WITNESS: No, sir.

14 BY MR. PHILLIPS:

15 Q Okay. So would you agree that there would be
16 added emphasis to the need for pro women campaign ads
17 given the uniqueness of Donald Trump's statements such
18 as "moving on her like a bitch" and "grab her by the
19 pussy"?

20 MR. STONEROCK: Objection, compound,
21 incomplete hypothetical, calls for speculation,
22 lacks foundation.

23 You can answer, Sean.

24 THE WITNESS: I think depending on the
25 campaign. I believe every video that you showed

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1 that you brought were played in 2016 when we had a
2 women's coalition then, as well, and that probably
3 was for a lot more of -- directed towards those
4 videos. 2020, I think it was not those videos, if
5 that makes sense.

6 BY MR. PHILLIPS:

7 Q It doesn't. Explain what you mean, please.

8 A So the women's coalition was more focused on
9 continuing to keep women with the president or behind
10 the president in 2020.

11 In 2016, those videos that you showed were
12 played by the news networks and they -- and in 2016,
13 the women's coalition was more to, I guess, correct the
14 narrative from the news networks.

15 Q What was incorrect -- what -- what news
16 narrative needed correcting related to Donald Trump
17 and women?

18 MR. STONEROCK: Vague and ambiguous as to
19 time.

20 You can answer, Sean.

21 THE WITNESS: That he was sexist.

22 BY MR. PHILLIPS:

23 Q Okay. So the news networks were also
24 referring to Donald Trump in terms that were
25 characterizing him as sexist?

<p style="text-align: right;">Page 109</p> <p>1 MR. STONEROCK: Vague as to time.</p> <p>2 THE WITNESS: What was that, Ryan? Sorry. I</p> <p>3 didn't hear.</p> <p>4 BY MR. PHILLIPS:</p> <p>5 Q He was just saying vague as to time.</p> <p>6 And let me just -- and let me just start over</p> <p>7 on time. Going into the 2020 election, is it -- is</p> <p>8 it -- we were talking -- so I've got a follow-up to an</p> <p>9 answer.</p> <p>10 A Uh-huh.</p> <p>11 Q So it's -- I believe we were talking about,</p> <p>12 going into the 2020 election, that there was a</p> <p>13 narrative in the news media that Donald Trump was</p> <p>14 sexist. True or untrue?</p> <p>15 A I would say that's true.</p> <p>16 Q Okay. Was there -- going into the 2020</p> <p>17 election, was there a narrative in the media that</p> <p>18 Donald Trump was racist?</p> <p>19 A I would --</p> <p>20 MR. STONEROCK: Calls for speculation, lacks</p> <p>21 foundation, incomplete hypothetical.</p> <p>22 You can answer it, Sean.</p> <p>23 THE WITNESS: I would say there was a</p> <p>24 narrative from the news networks.</p> <p>25 BY MR. PHILLIPS:</p>	<p style="text-align: right;">Page 111</p> <p>1 was -- what was Mary Trump -- didn't Mary Trump write a</p> <p>2 book, too?</p> <p>3 MR. STONEROCK: Objection, calls for</p> <p>4 speculation, lacks foundation, relevance.</p> <p>5 You can answer if you know, Sean.</p> <p>6 THE WITNESS: I don't -- I don't know the</p> <p>7 question.</p> <p>8 BY MR. PHILLIPS:</p> <p>9 Q Okay. Who is Mary Trump? Do you know who</p> <p>10 Mary Trump is?</p> <p>11 A No, sir.</p> <p>12 Q Okay. Are you aware that a family member of</p> <p>13 Donald Trump's wrote a book indicating that not only he</p> <p>14 was racist but his family was racist?</p> <p>15 A I do not know the detail of a book.</p> <p>16 Q Okay. Are you aware generally --</p> <p>17 A That she wrote a book?</p> <p>18 Q That she --</p> <p>19 A Sorry, I didn't mean to interrupt you.</p> <p>20 Q That's okay.</p> <p>21 Are you aware that a family member wrote a --</p> <p>22 wrote a book about Donald Trump?</p> <p>23 A Yes. I believe so, yes.</p> <p>24 Q Okay. Are you aware that that family member's</p> <p>25 name was Mary Trump?</p>
<p style="text-align: right;">Page 110</p> <p>1 Q That Donald Trump was racist going into the</p> <p>2 2020 election?</p> <p>3 A Yes, sir.</p> <p>4 Q Okay. So it wasn't just this lone atom out</p> <p>5 there, Omarosa Manigault Newman, that was saying Donald</p> <p>6 Trump was racist and -- and sexist? There was news --</p> <p>7 and, good grief, what I did to my hair. There was --</p> <p>8 let me start that over.</p> <p>9 It wasn't just this lone atom, Omarosa</p> <p>10 Manigault Newman, who was saying Donald Trump was</p> <p>11 sexist or racist, there was news coverage additionally;</p> <p>12 correct?</p> <p>13 MR. STONEROCK: Vague as to time.</p> <p>14 You can answer it, Sean.</p> <p>15 THE WITNESS: Yes, sir.</p> <p>16 BY MR. PHILLIPS:</p> <p>17 Q Okay. And that's going into the 2020 election</p> <p>18 we were referring to just because of the objection as</p> <p>19 to time; is that correct?</p> <p>20 A Correct.</p> <p>21 I would think that there were the news</p> <p>22 networks as well. But Omarosa was a part of -- that</p> <p>23 was not a news network publicly saying -- stating those</p> <p>24 comments about the president.</p> <p>25 Q What was Donald Trump's family -- I mean, what</p>	<p style="text-align: right;">Page 112</p> <p>1 A No, sir.</p> <p>2 Q Okay. Are you aware that that family member</p> <p>3 was a niece of Donald Trump?</p> <p>4 A No, sir.</p> <p>5 Q Okay. Are you aware that that book written by</p> <p>6 that family member alleged that Donald Trump was a</p> <p>7 racist?</p> <p>8 MR. STONEROCK: Calls for speculation</p> <p>9 and lacks foundation.</p> <p>10 You can answer if you know, Sean.</p> <p>11 THE WITNESS: No, I do not know the context of</p> <p>12 the book.</p> <p>13 BY MR. PHILLIPS:</p> <p>14 Q Okay. We are at -- I think I played 17. I</p> <p>15 think we're at 18. So video 18 produced to us by the</p> <p>16 campaign last night.</p> <p>17 MR. PHILLIPS: Hi, Mr. Gordon, by the way. I</p> <p>18 see you've joined us.</p> <p>19 (Playing video:)</p> <p>20 DANIELLE D'SOUZA GILL: Ladies, we've come a</p> <p>21 long way. There is no denying it. We are better</p> <p>22 off today than we were just a few years ago when</p> <p>23 President Trump was elected. More than 60 percent</p> <p>24 of all new jobs under Trump's administration are</p> <p>25 going to women. How incredible is that? President</p>

<p style="text-align: right;">Page 113</p> <p>1 Trump has turned around the nation for the benefit 2 of women, young, old, mothers, sisters, wives, 3 workers, and friends. 4 News broke just this January that women are 5 officially a majority of our workforce. Democrats 6 who rail against the president don't realize how 7 much support President Trump has from women. This 8 is because women are just as smart, just as 9 capable, and just as hard working as everyone else 10 and can make up their own minds about whether 11 policies benefit them. 12 Under President Trump, we are seeing women 13 succeed with unemployment at an all time low. We 14 are seeing women rising in their careers. We are 15 seeing women speaking up for what they believe in. 16 Women are empowered again, and Trump is making 17 America great again. Let's support President Trump 18 together. This is our time. 19 Text empower to 88022. 20 (End of video.) 21 (Respondent's Exhibit 18 was identified and 22 later marked for identification.) 23 BY MR. PHILLIPS: 24 Q I had to go back. So what is womenfortrump20 25 that's referenced in that ad?</p>	<p style="text-align: right;">Page 115</p> <p>1 to have a message that said, quote, women are just as 2 smart and capable as everyone else, end quote? 3 MR. STONEROCK: Calls for speculation, lacks 4 foundation, argumentative. 5 You can answer if you know, Sean. 6 THE WITNESS: I do not know, sir. 7 BY MR. PHILLIPS: 8 Q Okay. And did Omarosa say that women can't 9 make up their own mind about policies? 10 MR. STONEROCK: Calls for speculation, lacks 11 foundation. 12 You can answer if you know. 13 THE WITNESS: I do not know, sir. 14 BY MR. PHILLIPS: 15 Q Do you know why the campaign felt it important 16 to put out a message that indeed women can make up 17 their own mind about policy? 18 MR. STONEROCK: Same objections. 19 You can answer if you know, Sean. 20 THE WITNESS: I do not know. 21 BY MR. PHILLIPS: 22 Q Isn't that sexist? 23 MR. STONEROCK: Objection, calls for a legal 24 conclusion, argumentative. 25 You can answer, Sean.</p>
<p style="text-align: right;">Page 114</p> <p>1 A Women for Trump 2020? I am unsure. Just the 2 20, or 2020? 3 Q I don't know. 4 I was gonna ask, do you know who Danielle 5 D'Souza Gill is, and then right as I was about to ask 6 the question I saw it flash by. So just right there on 7 the opening graphic it says, "Board member 8 womenfortrump20." And it looks like an ad, so maybe 9 it's a -- I mean, it could even be just a Twitter 10 thing. 11 But do you know -- let me go back and just 12 ask, do you know who Danielle D'Souza Gill is? 13 A No, sir. 14 Q Do you know what this organization is, 15 womenfortrump20, or what she's a board member of? 16 A I would believe the coalition -- 17 Q Okay. 18 A -- Women for Trump. 19 Q Did Omarosa say anything to counter that 20 women -- did she say anything to the effect that women 21 aren't as smart or capable as men? She didn't say 22 that, did she? 23 A I do not know, sir. 24 Q Okay. Who would say that, women are just as 25 smart -- do you know why the campaign felt it necessary</p>	<p style="text-align: right;">Page 116</p> <p>1 THE WITNESS: I do not want to assume, but I 2 would think that most board members wrote their own 3 scripts, so it would be her herself writing that. 4 BY MR. PHILLIPS: 5 Q Okay. Fair enough. 6 Defendant's 19. We're getting close. There's 7 only 24, so we've got five more. One, two, three, 8 four, five, six. 9 (Playing video:) 10 IVANKA TRUMP: Women's economic empowerment 11 isn't just an issue of justice, it's an issue of 12 prosperity, it's an issue of security. With WEDP, 13 we're seeking to help countries go from being 14 recipients of U.S. development assistance to 15 trading partners. 16 Simply put, women's economic empowerment is 17 good, smart defense policy. We're incredibly 18 excited to be working on this initiative 19 and showing leadership as we export America's 20 values of freedom and equality to the world. 21 When women are economically empowered, 22 societies prosper and peace prevails. 23 (End of video.) 24 (Respondent's Exhibit 19 was identified and 25 later marked for identification.)</p>

<p style="text-align: right;">Page 117</p> <p>1 BY MR. PHILLIPS:</p> <p>2 Q Do you know if there's anything that -- did</p> <p>3 the campaign -- I guess the question is related to that</p> <p>4 ad, ad number 19. Did the campaign put that out</p> <p>5 related -- specifically to counter any message or</p> <p>6 statement by Omarosa Manigault Newman?</p> <p>7 MR. STONEROCK: Objection, calls for</p> <p>8 speculation, lacks foundation, vague as to</p> <p>9 specifically.</p> <p>10 You can answer, Sean.</p> <p>11 THE WITNESS: I do not know, sir.</p> <p>12 BY MR. PHILLIPS:</p> <p>13 Q Okay. Do you know what WGGP is?</p> <p>14 A No, sir.</p> <p>15 Q In that -- in that commercial -- do you know</p> <p>16 where that commercial aired?</p> <p>17 A It looks like a digital --</p> <p>18 Q Okay.</p> <p>19 A -- ad.</p> <p>20 Q The commercial states we're seeking to help</p> <p>21 countries. It's -- it's Ivanka Trump, the daughter of</p> <p>22 Donald Trump; correct?</p> <p>23 A She is the daughter, yes, sir.</p> <p>24 Q Okay. Well, let me -- let me pull up another</p> <p>25 video, which we'll label 19 -- oh, I think because last</p>	<p style="text-align: right;">Page 119</p> <p>1 should be issued visas.</p> <p>2 (Applause.)</p> <p>3 To put these new procedures in place, we will</p> <p>4 have to temporarily suspend immigration from some</p> <p>5 of the most dangerous and volatile regions of the</p> <p>6 world that have a history of exporting terrorism.</p> <p>7 Not for us, not for us.</p> <p>8 (End of video.)</p> <p>9 (Respondent's Exhibit 19A was identified and</p> <p>10 later marked for identification.)</p> <p>11 BY MR. PHILLIPS:</p> <p>12 Q 19A.</p> <p>13 Wouldn't it appear that the statements from</p> <p>14 Donald Trump himself actually counteract the messaging</p> <p>15 in the political campaign ad that talks about worldwide</p> <p>16 empowerment and peace and women empowerment?</p> <p>17 MR. STONEROCK: Objection, vague</p> <p>18 and ambiguous, vague as to time, compound.</p> <p>19 You can answer if you understand the question,</p> <p>20 Sean.</p> <p>21 THE WITNESS: I do not understand the</p> <p>22 question.</p> <p>23 BY MR. PHILLIPS:</p> <p>24 Q Okay. Let me just real quick -- actually, let</p> <p>25 me just do this. We'll go to 19B. I can probably skip</p>
<p style="text-align: right;">Page 118</p> <p>1 time I didn't have an A. We'll figure that out. But</p> <p>2 19A.</p> <p>3 (Playing video:)</p> <p>4 DONALD J. TRUMP: We should only admit into</p> <p>5 this country those who share our values and respect</p> <p>6 our people. In the cold war, we had a ideological</p> <p>7 screening test. The time is overdo to develop a</p> <p>8 new screening test for the threats we face today.</p> <p>9 I call it extreme vetting. I call it extreme,</p> <p>10 extreme vetting. Our country has enough problems.</p> <p>11 We don't need more. And these are problems like</p> <p>12 we've never had before.</p> <p>13 (Applause.)</p> <p>14 In addition to screening out all members of</p> <p>15 the sympathizers of terrorist groups, we must also</p> <p>16 screen out any who have hostile attitudes towards</p> <p>17 our country or its principles, or who believe that</p> <p>18 Sharia law should supplant American law.</p> <p>19 (Applause.)</p> <p>20 Those who do not believe in our constitution</p> <p>21 or who support bigotry and hatred will not be</p> <p>22 admitted for immigration into our country.</p> <p>23 (Applause.)</p> <p>24 Only those who we expect to flourish in our</p> <p>25 country and to embrace a tolerant American society</p>	<p style="text-align: right;">Page 120</p> <p>1 a question and ask it about both.</p> <p>2 (Playing video:)</p> <p>3 DONALD J. TRUMP: The U.S. has become a</p> <p>4 dumping ground for everybody else's problems.</p> <p>5 UNKNOWN SPEAKER: That's why we need you.</p> <p>6 (Applause.)</p> <p>7 DONALD J. TRUMP: Thank you.</p> <p>8 It's true. And these are the best and the</p> <p>9 finest.</p> <p>10 When Mexico sends its people, they're not</p> <p>11 sending their best. They're not sending you,</p> <p>12 they're not sending you. They're sending people</p> <p>13 that have lots of problems, and they're bringing</p> <p>14 those problems with us. They're bringing drugs,</p> <p>15 they're bringing crime. They're rapists.</p> <p>16 And some, I assume, are good people.</p> <p>17 But I speak to border guards, and they tell us</p> <p>18 what we're getting. And it only makes common</p> <p>19 sense, it only makes common sense. They're sending</p> <p>20 us not the right people. It's coming from more</p> <p>21 than Mexico. It's coming from all over South</p> <p>22 and Latin America, and it's coming probably,</p> <p>23 probably, from the Middle East. But we don't know</p> <p>24 because we have no protection and we have no</p> <p>25 confidence. We don't know what's happening.</p>

<p style="text-align: right;">Page 121</p> <p>1 And it's got to stop, and it's got to stop fast. 2 (End of video.) 3 (Respondent's Exhibit 19B was identified and 4 later marked for identification.) 5 BY MR. PHILLIPS: 6 Q Did you as the campaign or as -- as the 7 various roles of the campaign from the deputy director 8 of operations to director of operations, did you 9 conduct any polling about statements such as the 10 correlation between Mexicans and rapists or extreme, 11 extreme vetting, do any polling to determine if that 12 was actually hurting Donald Trump with foreign-based 13 but international-born voters? 14 MR. STONEROCK: Objection, vague 15 and ambiguous, relevance, vague and ambiguous as to 16 foreign-based international voters. 17 You can answer if you understand. 18 THE WITNESS: I do not. 19 BY MR. PHILLIPS: 20 Q Okay. Was any polling done -- are you aware 21 of any polling -- you know, going back to, I guess, ad 22 number 19, where the commercial says women's economic 23 empowerment is not just an issue of justice, it's an 24 issue of prosperity, and helping countries go from 25 developmental assistance to trading partners is good,</p>	<p style="text-align: right;">Page 123</p> <p>1 You can answer if you understand the question, 2 Sean. 3 THE WITNESS: I believe there was negative 4 media coverage about promoting America and putting 5 America first. 6 BY MR. PHILLIPS: 7 Q Okay. We talked about racism. Is -- is -- I 8 guess this is a definitional thing so we're on the same 9 page. But is -- is a statement made disparaging a 10 religion, so prevent Muslims from entering the country 11 or casting Muslims out based upon their believe in 12 Sharia law, or whatever, is -- is that -- is that 13 racism in your definition? 14 MR. STONEROCK: Objection, incomplete 15 hypothetical, misstates the video that we just 16 watched. 17 Sean, you can answer if you have an opinion. 18 THE WITNESS: No, I believe -- I -- I -- I 19 believe that's a little out of context. I 20 think the one -- I believe the countries that were 21 banned were actually Obama's -- were named by Obama 22 in his administration. So I don't think that you 23 could say that President Trump was primarily the 24 driver with deciding countries. But I -- I don't 25 believe that's racist, no.</p>
<p style="text-align: right;">Page 122</p> <p>1 smart defense policy versus Trump screaming that 2 Mexicans are correlated to rapists and we need 3 ideological screening and extreme, extreme vetting? 4 Was there any kind of quid pro quo? Was -- did -- did 5 his opinions lead to that ad? Do you know? Was there 6 any polling on that? 7 MR. STONEROCK: Objection, vague 8 and ambiguous, compound, incomplete hypothetical, 9 calls for speculation, lacks foundation. 10 You can answer if you know, Sean. 11 THE WITNESS: I believe your time frame is 12 different; right? So that ad does not counteract 13 statements from 2016. That's a 2020 ad; correct? 14 BY MR. PHILLIPS: 15 Q Correct. 16 A Yeah. So I would -- I don't think that ad is 17 created for any other statements prior to. So, yeah, I 18 don't -- I don't think that was -- I don't think it's 19 correlated at all. 20 Q Do you agree that there was a -- a narrative 21 whether -- do you agree that there was a narrative in 22 the media that Donald Trump was a xenophobe? Or, I 23 guess, to define xenophobe, had a fear of people 24 outside of the American nationality? 25 MR. STONEROCK: Vague as to time.</p>	<p style="text-align: right;">Page 124</p> <p>1 BY MR. PHILLIPS: 2 Q Do you feel like there was a narrative that 3 Trump was anti-Muslim going into the 2020 election? 4 MR. STONEROCK: Vague and ambiguous as to feel 5 like and narrative, and vague as to time. 6 THE WITNESS: Going into 2020's election, I 7 don't think it was, no. 8 BY MR. PHILLIPS: 9 Q Okay. Let me go to 20, which is a bit of a 10 longer commercial. Oh, wait. Let me go to -- let me 11 do this. Let me do 19C while I'm on this topic. I'll 12 play this video. 13 (Playing video:) 14 REPORTER: Mr. President, will you give an 15 apology for the statement yesterday? 16 UNKNOWN SPEAKER: Oh, boy. 17 REPORTER: Mr. President, did you refer to 18 African nations as shithole countries? 19 REPORTER: Mr. President, are you a racist? 20 REPORTER: Mr. President, will you respond to 21 these serious questions about your statement, sir? 22 UNKNOWN SPEAKER: No. It's absolute lies. 23 REPORTER: I'm talking to the president, not 24 you. 25 UNKNOWN SPEAKER: I'm talking to you.</p>

<p style="text-align: right;">Page 125</p> <p>1 REPORTER: Mr. President, are you a racist?</p> <p>2 (End of video.)</p> <p>3 (Respondent's Exhibit 19C was identified and</p> <p>4 later marked for identification.)</p> <p>5 BY MR. PHILLIPS:</p> <p>6 Q That appears to be -- 19C appears to be a clip</p> <p>7 from The Guardian. And it appears that media is -- is</p> <p>8 questioning Donald Trump about his use of the term</p> <p>9 "shithole countries" and whether he was a racist.</p> <p>10 And I -- I set that up to say this. You know,</p> <p>11 do you agree that there was, you know, way more than</p> <p>12 Omarosa out there with the narrative that Donald Trump</p> <p>13 was racist?</p> <p>14 MR. STONEROCK: Vague and ambiguous as to the</p> <p>15 time, vague as to way more.</p> <p>16 You can answer, Sean, if you understand.</p> <p>17 THE WITNESS: I think there were other</p> <p>18 narratives being pushed by media network.</p> <p>19 BY MR. PHILLIPS:</p> <p>20 Q Okay. Can you differentiate what harm was</p> <p>21 caused by networks and what harm was caused by Omarosa</p> <p>22 Manigault Newman?</p> <p>23 MR. STONEROCK: Calls for a legal conclusion,</p> <p>24 incomplete hypothetical, calls for speculation,</p> <p>25 lacks foundation.</p>	<p style="text-align: right;">Page 127</p> <p>1 networks and then, also, Omarosa as well. The news</p> <p>2 networks didn't sign an NDA with the campaign, so,</p> <p>3 I mean, it's just a little different. But there</p> <p>4 was a lot of money spent within media to try to</p> <p>5 correct the narrative.</p> <p>6 BY MR. PHILLIPS:</p> <p>7 Q And the narrative was created by media,</p> <p>8 Omarosa, and other individuals?</p> <p>9 A I believe Omarosa had more of a -- like I said</p> <p>10 before, the insider role, and had a lot more</p> <p>11 credibility to other voters. So news networks like CNN</p> <p>12 and others, obviously some people don't put any</p> <p>13 credibility to those networks. But when you have an</p> <p>14 individual who, whether they worked on the campaign or</p> <p>15 knew someone personally, then they put a little bit</p> <p>16 more credibility to it. So, yes, I would say that the</p> <p>17 campaign spent money --</p> <p>18 Q Would people --</p> <p>19 A -- (inaudible).</p> <p>20 Q Sorry.</p> <p>21 Would people put credibility in Donald --</p> <p>22 COURT REPORTER: I'm sorry. There were a few</p> <p>23 words there at the end that I could not hear. I</p> <p>24 ended with "I would say that the campaign spent</p> <p>25 money . . ."</p>
<p style="text-align: right;">Page 126</p> <p>1 You can answer, Sean, if you have an opinion</p> <p>2 on that.</p> <p>3 THE WITNESS: Yeah, I am -- I'm unaware about</p> <p>4 polling after any type of incident, and that would</p> <p>5 have been whether the president said it or another</p> <p>6 individual or a news network saying it.</p> <p>7 BY MR. PHILLIPS:</p> <p>8 Q Okay. I guess -- and we'll get into the</p> <p>9 contract probably next, the NDA. But the campaign is</p> <p>10 seeking damages from Omarosa Manigault Newman for</p> <p>11 saying comments, at least as we've talked about so far,</p> <p>12 about -- or carrying on a narrative about whether</p> <p>13 Donald Trump was a racist.</p> <p>14 And what I'm trying to understand is there --</p> <p>15 is there any way that you've -- you've determined to --</p> <p>16 to isolate comments made by Omarosa Manigault Newman as</p> <p>17 opposed to media as to how it damaged Donald Trump or</p> <p>18 the campaign?</p> <p>19 MR. STONEROCK: Calls for a legal conclusion,</p> <p>20 calls for expert testimony.</p> <p>21 Sean, you can answer if there's anything</p> <p>22 you've personally done.</p> <p>23 THE WITNESS: So I did give a little -- I</p> <p>24 guess it's more of a description of, like, the</p> <p>25 money spent on ads that were both from the news</p>	<p style="text-align: right;">Page 128</p> <p>1 MR. PHILLIPS: That was my fault, Sean.</p> <p>2 THE WITNESS: Oh, it's all right.</p> <p>3 I was -- I was saying a significant amount of</p> <p>4 money to try to counteract narrative pretty much.</p> <p>5 BY MR. PHILLIPS:</p> <p>6 Q Okay. And -- and I would imagine these --</p> <p>7 and we haven't identified a single person who didn't</p> <p>8 vote for Donald Trump or withheld a donation from</p> <p>9 Donald Trump because of something Omarosa Manigault</p> <p>10 Newman said; correct?</p> <p>11 MR. STONEROCK: Objection, misstates his</p> <p>12 testimony.</p> <p>13 You can answer, Sean.</p> <p>14 Calls for speculation, lacks foundation.</p> <p>15 If you have any personal knowledge, you can</p> <p>16 answer.</p> <p>17 THE WITNESS: I do not have personal knowledge</p> <p>18 of anybody, no, sir.</p> <p>19 BY MR. PHILLIPS:</p> <p>20 Q Okay. Would Donald Trump's own family member,</p> <p>21 Mary Trump, if she said Donald Trump was racist and his</p> <p>22 father was racist, wouldn't that ought to be</p> <p>23 influential in this narrative that Donald Trump is</p> <p>24 racist?</p> <p>25 MR. STONEROCK: Calls for speculation, lacks</p>

<p style="text-align: right;">Page 129</p> <p>1 foundation, incomplete hypothetical.</p> <p>2 You can answer if you know, Sean.</p> <p>3 THE WITNESS: I mean, I -- I do not know. I</p> <p>4 would think that there were other individuals, yes.</p> <p>5 BY MR. PHILLIPS:</p> <p>6 Q Okay. We'll use this as 19C [sic].</p> <p>7 (Playing video:)</p> <p>8 CNN ANCHOR: I want to ask you about the</p> <p>9 Anti-Defamation League, which this week called on</p> <p>10 you to publicly condemn unequivocally the racism of</p> <p>11 former KKK Grand Wizard David Duke, who recently</p> <p>12 said that voting against you at this point would be</p> <p>13 treason to your heritage.</p> <p>14 Will you unequivocally condemn David Duke and</p> <p>15 say that you don't want his vote or that of other</p> <p>16 white supremacists in this election?</p> <p>17 DONALD J. TRUMP: Well, just so you</p> <p>18 understand, I don't know anything about David Duke.</p> <p>19 Okay? I don't know anything about what you're even</p> <p>20 talking about with white supremacy or white</p> <p>21 supremacists. So I don't know. I mean, I don't</p> <p>22 know. Did he endorse me, or what's going on?</p> <p>23 Because, you know, I know nothing about David Duke,</p> <p>24 I know nothing about white supremacists, and so</p> <p>25 you're asking me a question that I'm supposed to be</p>	<p style="text-align: right;">Page 131</p> <p>1 him. And I just don't know anything about him.</p> <p>2 (End of video.)</p> <p>3 (Respondent's Exhibit 19D was identified and</p> <p>4 later marked for identification.)</p> <p>5 BY MR. PHILLIPS:</p> <p>6 Q Would comments like that -- I know there's</p> <p>7 been a few opportunities that Donald Trump has been, at</p> <p>8 a minimum, given negative news coverage for not</p> <p>9 renouncing white supremacy or the KKK. But I guess my</p> <p>10 question is would you agree that those would contribute</p> <p>11 to a narrative that he is racist?</p> <p>12 MR. STONEROCK: Objection, incomplete</p> <p>13 hypothetical, calls for speculation, lacks</p> <p>14 foundation, misstates the video, misstates the</p> <p>15 record.</p> <p>16 You can answer, Sean, if you have an opinion.</p> <p>17 THE WITNESS: I don't have an opinion.</p> <p>18 BY MR. PHILLIPS:</p> <p>19 Q Okay. Can someone support the KKK</p> <p>20 and simultaneously not be a racist? Do you have an</p> <p>21 opinion?</p> <p>22 MR. STONEROCK: Objection, incomplete</p> <p>23 hypothetical, argumentative, calls for speculation,</p> <p>24 lacks foundation, relevance.</p> <p>25 You can answer, Sean, if you have an opinion.</p>
<p style="text-align: right;">Page 130</p> <p>1 talking about people that I know nothing about.</p> <p>2 CNN ANCHOR: But I guess the question from the</p> <p>3 -- from the Anti-Defamation League is even if you</p> <p>4 don't know about their endorsement, there are these</p> <p>5 groups and individuals endorsing you. Would you</p> <p>6 just say unequivocally you condemn them and you</p> <p>7 don't want their support?</p> <p>8 DONALD J. TRUMP: Well, I have to look at the</p> <p>9 group. I mean, I don't know what group you're</p> <p>10 talking about. You wouldn't want me to condemn a</p> <p>11 group that I know nothing about. I would have to</p> <p>12 look. If you would send me a list of the groups, I</p> <p>13 will do research on them, and certainly I would</p> <p>14 disavow if I thought there was something wrong.</p> <p>15 CNN ANCHOR: The Klu Klux Klan?</p> <p>16 DONALD J. TRUMP: But you may have groups in</p> <p>17 there that are totally fine and it would be very</p> <p>18 unfair. So give me a list of the groups and I'll</p> <p>19 let you know.</p> <p>20 CNN ANCHOR: Okay. I mean, I'm just talking</p> <p>21 about David Duke and the Klu Klux Klan here,</p> <p>22 but . . .</p> <p>23 DONALD J. TRUMP: I don't know any --</p> <p>24 honestly, I don't know David Duke. I don't believe</p> <p>25 I've ever met him. I'm pretty sure I didn't meet</p>	<p style="text-align: right;">Page 132</p> <p>1 THE WITNESS: I don't have an opinion.</p> <p>2 BY MR. PHILLIPS:</p> <p>3 Q Can one be a white supremacist and not be a</p> <p>4 racist?</p> <p>5 MR. STONEROCK: Same objections.</p> <p>6 THE WITNESS: I don't have an opinion to that,</p> <p>7 either.</p> <p>8 BY MR. PHILLIPS:</p> <p>9 Q Okay. Would expressing -- would -- would</p> <p>10 garnering support for white supremacist</p> <p>11 organizations -- I -- I kind of reflect back to a -- I</p> <p>12 believe it was a Joe Biden quote, that I don't have to</p> <p>13 call Donald Trump a racist because the racists know</p> <p>14 he's a racist. I say that to set up a question because</p> <p>15 that was purely paraphrased.</p> <p>16 Would having support of white supremacist</p> <p>17 groups have contributed to a narrative that Donald</p> <p>18 Trump was indeed a white supremacist or a racist?</p> <p>19 MR. STONEROCK: Calls for speculation, lacks</p> <p>20 foundation, argumentative, incomplete hypothetical.</p> <p>21 You can answer if you understand the question,</p> <p>22 Sean.</p> <p>23 THE WITNESS: John, if you could repeat that,</p> <p>24 the question, please.</p> <p>25 BY MR. PHILLIPS:</p>

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1 Q Sure. Would -- I'm trying to find a way to
2 phrase it shorter. We'll move along. We'll do 19 --
3 we'll do 19D [sic]. It's a very quick clip.
4 (Playing video:)
5 DONALD J. TRUMP: Negotiating with -- with
6 Japan, negotiating with China, when these people
7 walk in the room they don't say: Oh, hello. How's
8 the weather? It's so beautiful outside. Isn't it
9 lovely. How are the Yankees doing? Oh, they're
10 doing wonderful. Great.
11 They say: We want deal. He'd jump out of the
12 seat. But --

13 (End of video.)
14 (Respondent's Exhibit 19E was identified and
15 later marked for identification.)
16 BY MR. PHILLIPS:

17 Q And, you know, again I'm not asking you is
18 that a racist comment because that seems to me to be a
19 matter of opinion. But would comments like that be a
20 part of the countermessaging the campaign had to do
21 related to race?

22 MR. STONEROCK: Calls for speculation, lacks
23 foundation, vague as to time.
24 You can answer it, Sean, if you know.

25 THE WITNESS: No, sir.

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1 BY MR. PHILLIPS:

2 Q Is it okay to mock somebody's foreign --
3 foreign accent or way of speaking?

4 MR. STONEROCK: Objection, argumentative.
5 You can answer if you have an opinion, Sean.

6 THE WITNESS: Say that again, John. Sorry.

7 BY MR. PHILLIPS:

8 Q Yeah. The -- the -- I mean -- and, again,
9 I -- I don't want to get into my personal
10 characterization, but that clip has been played in
11 media -- in media at a minimum to characterize Donald
12 Trump as racially insensitive or racist because of the
13 way that he characterized Asian Americans or Asian
14 American way of speaking.

15 And I guess my question is, would that have
16 been part of the justification for, you know, ads that
17 show Donald Trump isn't a racist?

18 MR. STONEROCK: Objection, incomplete
19 hypothetical, calls for speculation, lacks
20 foundation, vague as to time.

21 You can answer, Sean, if you know.

22 THE WITNESS: No, sir, I don't believe any
23 type of replay of that clip or anything. I mean,
24 you said Asian Americans, but I don't believe
25 that's what he was talking about. Right. So --

1 so, no, I don't think any ads were actually created
2 to try to counteract that.

3 BY MR. PHILLIPS:

4 Q Right. And I think you're right. I think he
5 was going straight as to either Japanese or Chinese
6 individuals, not -- not Japanese or Chinese Americans.
7 But we were -- you know, this all stemmed off an ad
8 talking about economic empower- -- empowerment and --
9 and helping each -- each nation.

10 And I guess my question, you know, stemmed
11 from isn't that contradictory, meaning isn't mocking a
12 culture of people exactly opposite of saying we're --
13 we're one world and -- and -- and it's not an issue of
14 justice, it's an issue of prosperity?

15 MR. STONEROCK: Objection, misstates the video
16 clip of Mr. Trump speaking, argumentative, vague
17 and ambiguous as to time, calls for speculation,
18 lacks foundation, incomplete hypothetical.

19 You can answer, Sean, if you understand.

20 THE WITNESS: I'm -- I don't believe that he
21 was mocking anyone in that clip, so . . .

22 BY MR. PHILLIPS:

23 Q Okay. While we're -- I'll do 19E [sic] while
24 we're on mocking.

25 (Playing video:)

1 JOHN BERMAN: Donald Trump is facing new
2 criticism for something he did on the campaign
3 trail last night in South Carolina. While
4 defending his debunked claim that he saw thousands
5 of Muslims celebrate the collapse of the Twin
6 Towers here in New York, he appeared to mock a
7 reporter with a disability.

8 Take a look.

9 DONALD J. TRUMP: Written by a nice reporter.
10 Now the poor guy -- you've got to see this guy.

11 Oh, I don't know what I said. I don't remember.

12 He's going, like: I don't remember. Maybe that's
13 what I said.

14 This was 14 years ago. He's still -- they
15 didn't do a retraction.

16 JOHN BERMAN: That reporter he is talking
17 about is Serge Kovalski, who now works for The New
18 York Times. As you can see right there, he suffers
19 from a chronic condition that impairs movement of
20 his arms. A Times spokesman says they find it
21 outrageous that Trump would ridicule the man's
22 appearance.

23 (End of video.)

24 (Respondent's Exhibit 19F was identified and
25 later marked for identification.)

<p style="text-align: right;">Page 137</p> <p>1 BY MR. PHILLIPS:</p> <p>2 Q Was that an example of unfavorable media</p> <p>3 coverage of your candidate?</p> <p>4 A I would say so.</p> <p>5 Q Was that an example of fair or unfair media</p> <p>6 coverage of your candidate?</p> <p>7 MR. STONEROCK: Objection, relevance. What</p> <p>8 does this video have anything to do with any of the</p> <p>9 claims in this case or any of the damages that the</p> <p>10 campaign suffered?</p> <p>11 You can -- you know, you can answer, Sean, if</p> <p>12 you have an opinion.</p> <p>13 MR. PHILLIPS: Please stop with the speaking</p> <p>14 objections, Ryan.</p> <p>15 MR. STONEROCK: You did it all day on Monday.</p> <p>16 So you -- you stop, and then we can talk.</p> <p>17 MR. PHILLIPS: I haven't had one speaking</p> <p>18 objection today.</p> <p>19 MR. STONEROCK: Yeah, you're taking the</p> <p>20 deposition. You're not making objections.</p> <p>21 MR. PHILLIPS: You are a lawyer.</p> <p>22 THE WITNESS: So can you say the -- I don't --</p> <p>23 I think --</p> <p>24 BY MR. PHILLIPS:</p> <p>25 Q Yeah. Was that unfavorable or favorable media</p>	<p style="text-align: right;">Page 139</p> <p>1 know, a number of things, all of the need to</p> <p>2 rehabilitate Donald Trump's image is because of</p> <p>3 Omarosa, not because he's got a terrible image because</p> <p>4 he says terrible things?</p> <p>5 MR. STONEROCK: Objection, compound, misstates</p> <p>6 his testimony.</p> <p>7 You can answer.</p> <p>8 THE WITNESS: I think ads that are created</p> <p>9 within an election are based off of what's fresh in</p> <p>10 voters' minds. But, yeah, that's -- that about</p> <p>11 sums up that one.</p> <p>12 BY MR. PHILLIPS:</p> <p>13 Q Okay. Move on to the campaign produced --</p> <p>14 produced to me video number 20. Oh, five minutes.</p> <p>15 (Playing video:)</p> <p>16 CATALINA LAUF: I'm Catalina Lauf. I work in</p> <p>17 a political space.</p> <p>18 MADELINE LAUF: And I'm Madeline Lauf. And</p> <p>19 I'm the founder of Begin Health, a children's</p> <p>20 nutritional company.</p> <p>21 CATALINA LAUF: We grew up in a really small</p> <p>22 town outside of Chicago.</p> <p>23 MADELINE LAUF: Our mom's from Guatemala, our</p> <p>24 dad's a small business owner from Chicago, and so</p> <p>25 they brought two different cultures together to</p>
<p style="text-align: right;">Page 138</p> <p>1 coverage of your candidate?</p> <p>2 A Again, kind of to go off of what Ryan said, I</p> <p>3 -- I think that it really doesn't have anything to do</p> <p>4 with the 2020 election. The question itself would be</p> <p>5 unfavorable media coverage, but that was also 2016.</p> <p>6 Q Okay. 2016 came before 2020; correct?</p> <p>7 A Yes.</p> <p>8 Q Okay. And so the opinion in some voters'</p> <p>9 minds would be built on not days, not just weeks, but</p> <p>10 years of experience with a candidate -- is that fair --</p> <p>11 in politics?</p> <p>12 MR. STONEROCK: Calls for speculation, lacks</p> <p>13 foundation, incomplete hypothetical.</p> <p>14 Sean, you can answer if you have a -- if you</p> <p>15 have a response.</p> <p>16 THE WITNESS: I don't think that creating ads</p> <p>17 for a 2020 election would try to counteract a</p> <p>18 narrative from 2016 outside of what the president</p> <p>19 already did in keeping to his promises when he was</p> <p>20 in office, so . . .</p> <p>21 BY MR. PHILLIPS:</p> <p>22 Q So all of the negative portrayals, whether</p> <p>23 it's Access Hollywood, whether it's mock -- potentially</p> <p>24 mocking the disabled, whether it's calling African</p> <p>25 nations shithole countries, whether it's saying, you</p>	<p style="text-align: right;">Page 140</p> <p>1 create us. A little bit of crazy and . . .</p> <p>2 CATALINA LAUF: A little bit of fun, I guess.</p> <p>3 MADELINE LAUF: Yes.</p> <p>4 CATALINA LAUF: They taught us the values of</p> <p>5 hard work, liberty, to love this country</p> <p>6 unapologetically.</p> <p>7 Our dad is a bee keeper, and just had so many</p> <p>8 different things out in the countryside and it was</p> <p>9 just such a sweet thing.</p> <p>10 MADELINE LAUF: We grew up selling honey --</p> <p>11 CATALINA LAUF: Yeah.</p> <p>12 MADELINE LAUF: -- at farmer's markets.</p> <p>13 CATALINA LAUF: Yeah.</p> <p>14 MADELINE LAUF: So my line was: Have you ever</p> <p>15 been stung by a bee?</p> <p>16 But, really, it was teaching us, again,</p> <p>17 entrepreneurship, small business, self-reliance,</p> <p>18 and that we're the ones that need to put in the</p> <p>19 hard work to get what we want.</p> <p>20 CATALINA LAUF: And my mother being from</p> <p>21 Guatemala, escaping what she had there, growing up</p> <p>22 in poverty, and coming here to the United States,</p> <p>23 being able to fulfill her destiny and be somebody</p> <p>24 that she couldn't there in her home country.</p> <p>25 MADELINE LAUF: And they really instilled in</p>

<p style="text-align: right;">Page 141</p> <p>1 us the sense of purpose, but, also, 2 self-accountability. And that we had to strive to 3 do the things that we wanted, and it was up to us 4 to make those things happen. 5 CATALINA LAUF: In America, there's no ceiling 6 of opportunity. You know, you define your own 7 destiny through personal responsibility, through 8 hard work, through having a moral value system. 9 That's the American dream. And President Trump's 10 providing that for everybody. 11 MADELINE LAUF: Look at my business, Begin 12 Health. As a small start-up that is growing 13 and launching, we are constantly trying to 14 innovate. 15 And the big challenge that COVID brought that 16 we just didn't see coming was that just almost 17 everything kind of just shut down. And when you 18 are a small start-up and you have limited funding 19 and the funding is really only to kind of get you 20 to that next milestone, we were really struggling. 21 And so we were able to apply for a PPP loan, 22 which really helped allow us to continue hiring 23 and working and developing our products so that we 24 could ultimately still launch. 25 CATALINA LAUF: It's now more than ever so</p>	<p style="text-align: right;">Page 143</p> <p>1 the American economy. There will be 2 overregulation, overtaxation. It's very hard to 3 innovate through those two things. 4 And ultimately what's really sad is the 5 thought of, you know, making all of us dependent on 6 the government, and we are not going to allow that. 7 CATALINA LAUF: I've seen a lot of moderates, 8 a lot of people now changing over because of 9 everything that's been happening. This is a taste 10 of Biden's America. I mean, this -- the rioting, 11 the crime. Freedom is at stake now. And this is 12 going to be the most important election of our 13 lifetime. 14 MADELINE LAUF: We want to preserve the 15 America that our mother came here for. 16 CATALINA LAUF: Having a thriving economy, 17 that is keeping American great, and President Trump 18 has delivered on that promise. He's truly fighting 19 for the American people. 20 We're the greatest country in the world, 21 period. On our worst day, we're still the greatest 22 country in the world. And in order to preserve 23 that, it's by putting America first, having a 24 thriving economy, having happiness. 25 (End of video.)</p>
<p style="text-align: right;">Page 142</p> <p>1 important to have a president and an administration 2 that understands that small business is the 3 backbone of our economy. 4 The Tax Cuts and Jobs Act was huge, 5 manufacturing, deregulation, fair trade. These are 6 things that affected real Americans. 7 We have a champion in the oval office who has 8 this business background. He actually understands 9 the need for small businesses like my sister's to 10 survive. 11 We aren't the stereotypical conservative. I 12 mean, we're -- we come from Hispanic descent, 13 and we're millennial women, and that's not what the 14 media wants. And so somebody like AOC, Alexandria 15 Ocasio-Cortez, this far left, these women come out 16 with these very, very destructive political 17 ideologies that are trying to infiltrate 18 millennials and the next generation. I've decided 19 to step up and say: Well, we need a countervoice 20 to these women. 21 MADELINE LAUF: There has been an assault on 22 capitalism just generally. And I think it's very 23 scary to imagine a Biden world where the 24 progressive wing ideas are starting to take front 25 and center stage. You know, that will really choke</p>	<p style="text-align: right;">Page 144</p> <p>1 (Respondent's Exhibit 20 was identified and 2 later marked for identification.) 3 BY MR. PHILLIPS: 4 Q Did that -- I noticed that video mentioned 5 Congresswoman Ocasio-Cortez. Did that -- did that 6 video mention Omarosa Manigault Newman? 7 A No. 8 Q Okay. How -- how was that video in any way 9 responsive to any of Ms. Newman's comments or 10 statements? 11 MR. STONEROCK: Calls for speculation, lacks 12 foundation. 13 You can answer if you know, Sean. 14 THE WITNESS: It's a great commercial, just 15 like all the others. They've been really good 16 today. 17 Overall, I think it still goes back to the 18 same statement before, and that's building the 19 coalition of voters for the president. 20 BY MR. PHILLIPS: 21 Q Okay. So that has nothing to do with Omarosa 22 Manigault Newman? 23 MR. STONEROCK: Objection, misstates his 24 testimony. 25 BY MR. PHILLIPS:</p>

<p style="text-align: right;">Page 145</p> <p>1 Q Did it have anything to do with Omarosa 2 Manigault Newman?</p> <p>3 A So comments made by Omarosa, I don't think it 4 -- like we discussed, I don't think it mentioned her at 5 all in that commercial. But it's trying to correct a 6 narrative that was out there publicly by Omarosa, among 7 other things. But, yes.</p> <p>8 Q Okay. There was a burning police vehicle, 9 talking about, at the same time, Biden's America. Did 10 the voters of the United States choose Biden's America?</p> <p>11 MR. STONEROCK: Objection, vague and ambiguous 12 as to Biden's America, calls for speculation, lacks 13 foundation.</p> <p>14 MR. PHILLIPS: That's fair. I'll withdraw 15 that question.</p> <p>16 BY MR. PHILLIPS:</p> <p>17 Q Who won the election?</p> <p>18 A President Biden.</p> <p>19 Q Okay. Do you have -- do you have a belief 20 that that election is gonna be overturned?</p> <p>21 MR. STONEROCK: Objection, irrelevant. 22 I'm going to instruct the witness not to 23 answer it.</p> <p>24 MR. PHILLIPS: Okay.</p> <p>25 BY MR. PHILLIPS:</p>	<p style="text-align: right;">Page 147</p> <p>1 deemed an essential business, a mother as well. 2 DAWN: I am. I am a mother of four. And I 3 have two identical twins.</p> <p>4 KRISTY: Yes, I homeschool my daughter, 5 and I'm also an ESL teacher. I teach English as a 6 second language. And my daughter --</p> <p>7 JOHN PENCE: That's great.</p> <p>8 KRISTY: -- has to call me Teacher Kristy.</p> <p>9 JOHN PENCE: Before I begin, I actually wanted 10 to invite a special guest who wanted to thank you 11 personally today.</p> <p>12 DAWN: Okay.</p> <p>13 LARA TRUMP: Hello. Hi, Kristy.</p> <p>14 KRISTY: Oh, my gosh.</p> <p>15 LARA TRUMP: How are you?</p> <p>16 KRISTY: I was going to say, like, is there 17 any way I can take a screenshot of this somehow?</p> <p>18 LARA TRUMP: I wanted to say hello.</p> <p>19 I know that you've been one of the fortunate 20 ones that your business has been able to stay open 21 right now, in the time of coronavirus, when many of 22 us are working from home.</p> <p>23 How has everything been going?</p> <p>24 DAWN: It's going good. The construction 25 projects are really just starting to -- to begin</p>
<p style="text-align: right;">Page 146</p> <p>1 Q Did Donald Trump draft and create the PPP 2 loan, or did Congress?</p> <p>3 MR. STONEROCK: Calls for speculation, lacks 4 foundation.</p> <p>5 You can answer if you know, Sean.</p> <p>6 THE WITNESS: I'm unaware.</p> <p>7 BY MR. PHILLIPS:</p> <p>8 Q Okay. 21. Oh, goodness. These are long. 9 Okay.</p> <p>10 (Playing video:)</p> <p>11 JOHN PENCE: I'm John Pence with Team Trump. 12 Today we'll speak with real American heros, a 13 mother from Macomb County, Michigan, who voted for 14 President Obama twice, but is ready to vote Trump 15 again in November.</p> <p>16 Another mother and business owner from 17 Pennsylvania who's running an essential business 18 while homeschooling her twin children.</p> <p>19 We want to talk with them, real American 20 heros.</p> <p>21 Hey, Kristy, how are you?</p> <p>22 KRISTY: Can you see me?</p> <p>23 JOHN PENCE: I can see you. There you are.</p> <p>24 DAWN: Thank you for having me.</p> <p>25 JOHN PENCE: You are in Pennsylvania. You are</p>	<p style="text-align: right;">Page 148</p> <p>1 this weekend.</p> <p>2 LARA TRUMP: I just wanted to -- to say thank 3 you for obviously supporting the president.</p> <p>4 KRISTY: She's eavesdropping. Zoey -- Zoey, 5 this is Lara Trump.</p> <p>6 LARA TRUMP: Hi.</p> <p>7 ZOEY: Hello.</p> <p>8 LARA TRUMP: How are you? Aww.</p> <p>9 DAWN: Thank you. And thank your family for 10 everything. I don't -- I feel like not only do we 11 get a -- a president, but we've got a -- a whole 12 family working.</p> <p>13 LARA TRUMP: Oh, you're so nice.</p> <p>14 DAWN: And I can't thank you enough.</p> <p>15 LARA TRUMP: Thank you.</p> <p>16 KRISTY: A couple years ago my daughter and I 17 wrote a note to him saying how we love him and 18 we're praying for him because he hears all kinds of 19 bad stuff, and we got this back.</p> <p>20 LARA TRUMP: Oh, my gosh. Look at that.</p> <p>21 DONALD J. TRUMP: We have to take care of our 22 people.</p> <p>23 LARA TRUMP: How are things feeling in -- in 24 Western Pennsylvania these days for the president?</p> <p>25 DAWN: I think it's really good. I think that</p>

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1 our blue state is turning red.

2 KRISTY: And I have to say, as great as I
3 thought of him in 2016, he's exceeded all of my
4 expectations. I'm so grateful for him. He's done
5 more than I think anyone thought a president could
6 do, especially with all the resistance, so . . .

7 JOHN PENCE: Promises made, promises kept;
8 right?

9 LARA TRUMP: Oh, wow. We know he's the right
10 man for the job.

11 DAWN: The only man for the job.

12 LARA TRUMP: He is the only man. He did it
13 once, he'll do it again.

14 But again, I just wanted to -- to say hello
15 and say thank you again for being such a great
16 supporter of our president.

17 It was so nice to talk to you and see you
18 and meet your daughter.

19 KRISTY: Thank you so much.

20 JOHN PENCE: Take care.

21 KRISTY: Bye.

22 JOHN PENCE: So that's the American story, a
23 story of two mothers, who, as we fight this virus,
24 are doing their part to beat it. It's a story of
25 prevailing. It's a story of America. And they

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1 know that President Trump has their back.

2 Together we can keep America great. Until
3 then, stay safe.

4 DONALD J. TRUMP: You will never be forgotten
5 again. The forgotten men and women of this country
6 will never, ever be forgotten again.

7 (End of video.)

8 (Respondent's Exhibit 21 was identified and
9 later marked for identification.)

10 BY MR. PHILLIPS:

11 Q Plaintiff's 21.

12 Who is John Pence?

13 A He's the vice president's, or ex-vice
14 president's, nephew.

15 Q Okay. Did he have a role with the campaign at
16 that period in time?

17 A Yes.

18 Q What was it?

19 A John had a few different roles on the
20 campaign. I think at that point in time was more
21 grassroots efforts.

22 Q And who was Lara Trump?

23 A It's President Trump's daughter-in-law.

24 Q Would that be Eric Trump's wife?

25 A Yes, sir.

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1 Q Okay. Did she have a role with the campaign
2 at that time?

3 A Yes, sir.

4 Q Did you have a conversation with Lara Trump
5 about Omarosa Manigault Newman?

6 A Yes, sir.

7 Q Tell me about that.

8 A She asked me about hiring her back onto the
9 campaign, and what type of roles we would be able to
10 provide her.

11 Q And what did you say?

12 A I said we can give whatever role we need to
13 do, and then it would be great to have her back on the
14 team.

15 Q Did you talk compensation?

16 MR. STONEROCK: Objection as to time.

17 BY MR. PHILLIPS:

18 Q During that conversation or around that
19 conversation with Lara Trump, did you talk about
20 compensation related to bringing Omarosa Manigault
21 Newman back to the campaign after she finished her
22 Whitehouse tenure?

23 A I believe so.

24 Q Do you recall what that compensation that were
25 to be offered to Omarosa Manigault Newman would be?

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1 A No, sir.

2 Q Does \$15,000 a month sound correct?

3 A It sounds about right.

4 Q Okay. And what was Omarosa Manigault Newman
5 to do for the campaign for \$15,000 a month?

6 MR. STONEROCK: Calls for speculation, lacks
7 foundation.

8 You can answer if you know, Sean.

9 THE WITNESS: I think it would have been more
10 of, like, an advisory role, still building
11 coalitions. We were still a campaign. And then
12 bringing her on to help build for the 2020
13 reelection.

14 BY MR. PHILLIPS:

15 Q Would it require signing the Donald J. Trump
16 for President, Inc. Companion Agreement that was
17 presented to her?

18 MR. STONEROCK: Calls for speculation, lacks
19 foundation.

20 You can answer if you know.

21 THE WITNESS: Yes, sir.

22 BY MR. PHILLIPS:

23 Q Okay. And you were the proposed signatory of
24 that agreement, were you not? Do you recall?

25 A I believe so, sir.

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1 Q Okay. Let me just pull that up for you.
 2 Basic. I've done so many videos, now I've got to
 3 remember how to do -- let's do it this way. Nope.
 4 Yep.
 5 Can you see that agreement?
 6 A Yes, I can, sir.
 7 Q Okay. I don't know -- I put where you could
 8 control it. I don't know if you can control it or not.
 9 Can you move it?
 10 A No, sir.
 11 Q Okay.
 12 A And there's a little tab over here. Let me
 13 see if this has anything to do with it.
 14 No, sir.
 15 Q Well, let me know what you need me to do to
 16 familiarize yourself with it. But I'm going to have a
 17 couple questions. I'm going to start with page 1,
 18 and I'm going to scroll down real quick to page 6.
 19 Is that your name as -- as potential
 20 signatory, Sean Dollman, director of operations for
 21 Donald J. Trump for President, Inc.?
 22 A Yes, sir.
 23 Q And this was to be signed by Omarosa Manigault
 24 Newman; is that correct?
 25 A Yes, sir.

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1 Q Do you know who drafted this?
 2 A It would have been legal counsel.
 3 Q Do you know who legal counsel was at that
 4 time?
 5 A I believe it was Jones Day.
 6 Q Okay. What was the purpose of getting Omarosa
 7 Manigault Newman to sign the Companion Agreement as you
 8 were aware of it, to the extent you were aware of it?
 9 A Everybody who was employed by the campaign
 10 signed an NDA.
 11 Q Okay. And -- and you were aware at this
 12 point, I assume, that Omarosa had already signed an NDA
 13 with the campaign when she worked at the campaign;
 14 right?
 15 A Yes, sir.
 16 Q Okay. Why did she need another one?
 17 A This one included the Pence family as well.
 18 Q Okay. I want to direct you to the No
 19 Disparagement clause, which is on page 2, number 2.
 20 This No Disparagement clause is a little different from
 21 the other NDA in that there is that last sentence, "To
 22 avoid any doubt, you agree that this shall survive the
 23 termination of this agreement pursuant to paragraph
 24 10."
 25 Do you know what that contract is talking

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1 about, or proposed contract, to avoid any doubt?
 2 MR. STONEROCK: Objection, calls for a legal
 3 conclusion.
 4 John, can you just scroll down to paragraph 10
 5 so I can see it?
 6 MR. PHILLIPS: Yes. Sure. Sure.
 7 MR. STONEROCK: All right. Sean -- I mean,
 8 I've -- I've read it. Let us know when you're
 9 ready, Sean.
 10 BY MR. PHILLIPS:
 11 Q And I'm not asking for a legal conclusion. My
 12 question is do you know why this paragraph 2, page 2,
 13 says, "To avoid any doubt, you agree that this shall
 14 survive the termination of this agreement pursuant to
 15 paragraph 10"? Did you have any understanding as to
 16 why that was in there?
 17 MR. STONEROCK: Objection, calls for a legal
 18 conclusion, calls for attorney work product, calls
 19 for attorney-client communications.
 20 You can answer, Sean, to the extent it's not
 21 based upon anything you would have discussed with
 22 legal counsel.
 23 THE WITNESS: No, I did not write the
 24 document, so . . .
 25 BY MR. PHILLIPS:

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1 Q Okay. Did you have any discussions with Lara
 2 Trump or anybody else that's non-counsel related to
 3 what doubt might have been in a prior contract that she
 4 signed?
 5 MR. STONEROCK: Objection. Same objection as
 6 the last time around.
 7 THE WITNESS: I mean, every- -- everybody
 8 signed an NDA.
 9 BY MR. PHILLIPS:
 10 Q Did you have any conversations with Lara Trump
 11 about why Omarosa specifically needed to sign a new
 12 NDA?
 13 A She was coming back to the campaign. We had a
 14 new NDA.
 15 Q Okay. Was the other NDA expired? Was that
 16 part of your conversations with Lara Trump?
 17 MR. STONEROCK: Objection, calls for a legal
 18 conclusion, calls for attorney work product, calls
 19 for attorney-client privileged communications.
 20 You can answer if you specifically discussed
 21 that issue with Lara Trump.
 22 THE WITNESS: That was not discussed.
 23 BY MR. PHILLIPS:
 24 Q Okay.
 25 A To my knowledge, it was not discussed. I

<p style="text-align: right;">Page 157</p> <p>1 don't -- I don't recall the entire conversation.</p> <p>2 Q How many conversations did you have with Lara</p> <p>3 Trump over bringing Omarosa Manigault Newman back to</p> <p>4 the campaign?</p> <p>5 A I'm -- I'm unsure. I would probably say it</p> <p>6 was a while ago. Maybe two to three, possibly four.</p> <p>7 Q Was there any expression by Lara Trump that --</p> <p>8 that wanted to bring Omarosa Manigault Newman back to</p> <p>9 the campaign to shut her up or to prevent her from</p> <p>10 talking further about Donald Trump?</p> <p>11 A No, sir.</p> <p>12 Q Okay. So paragraph 2, page 2, says, "To avoid</p> <p>13 any doubt, you agree that this shall survive the</p> <p>14 termination of this agreement pursuant to paragraph</p> <p>15 10."</p> <p>16 And I suspect you -- you don't know about</p> <p>17 paragraph 10, either, but I've got to ask the</p> <p>18 questions. Do you know how or why paragraph 10 was</p> <p>19 inserted into this document?</p> <p>20 MR. STONEROCK: Objection, calls for a legal</p> <p>21 conclusion, calls for attorney work product, calls</p> <p>22 for attorney-client communications.</p> <p>23 Sean, you can answer if you have knowledge</p> <p>24 based upon anything but what -- what counsel for</p> <p>25 the campaign may or may not have told you.</p>	<p style="text-align: right;">Page 159</p> <p>1 Consulting Agreement as 21C. I realize I'm</p> <p>2 skipping -- I guess because 21 is 21A.</p> <p>3 (Respondent's Exhibit 21C was identified and</p> <p>4 later marked for identification.)</p> <p>5 BY MR. PHILLIPS:</p> <p>6 Q So this is a Consulting Agreement that would</p> <p>7 be effective January 21 -- or, sorry -- January 22,</p> <p>8 2018. Just to scroll through, services under the</p> <p>9 exhibit would be surrogate speaking appearances,</p> <p>10 fundraising appearances, diversity outreach. I'm happy</p> <p>11 to flip to -- there's three slides, essentially. I'm</p> <p>12 happy to flip to any of them.</p> <p>13 But do you know whether this Consulting</p> <p>14 Agreement -- I guess what, if anything, this Consulting</p> <p>15 Agreement had to do with the Companion Agreement we</p> <p>16 just discussed?</p> <p>17 MR. STONEROCK: Objection, calls for a legal</p> <p>18 conclusion, calls for attorney work product, calls</p> <p>19 for attorney-client communication.</p> <p>20 If you have an understanding, Sean, based on</p> <p>21 anything other than correspondence with counsel,</p> <p>22 you can answer.</p> <p>23 THE WITNESS: No, sir.</p> <p>24 BY MR. PHILLIPS:</p> <p>25 Q Okay. Do you know if this was offered to you</p>
<p style="text-align: right;">Page 158</p> <p>1 THE WITNESS: I mean, I -- I -- I do not know.</p> <p>2 I believe the survival was also in the original NDA</p> <p>3 as well.</p> <p>4 BY MR. PHILLIPS:</p> <p>5 Q Okay. So I guess assuming the survival</p> <p>6 paragraph 10 was also in the other standard NDA, do you</p> <p>7 know why emphasis was added "To avoid any doubt" -- "to</p> <p>8 avoid any doubt, you agree that this shall survive the</p> <p>9 termination pursuant to paragraph 10"? Why that phrase</p> <p>10 was added?</p> <p>11 MR. STONEROCK: Calls for a legal conclusion,</p> <p>12 calls for attorney work product, calls for</p> <p>13 attorney-client communications, asked and answered.</p> <p>14 Sean, you can answer if you have any knowledge</p> <p>15 based upon anything other than conversations or</p> <p>16 communications with counsel.</p> <p>17 THE WITNESS: No, sir.</p> <p>18 BY MR. PHILLIPS:</p> <p>19 Q Okay.</p> <p>20 MR. PHILLIPS: We'll attach that as</p> <p>21 Defendant's 21B because it came out of the Lara</p> <p>22 Trump video.</p> <p>23 (Respondent's Exhibit 21B was identified and</p> <p>24 later marked for identification.)</p> <p>25 We are going to attach this one as -- this</p>	<p style="text-align: right;">Page 160</p> <p>1 as a part of the attempt to get Omarosa -- strike that.</p> <p>2 Do you know if this was presented to Omarosa</p> <p>3 Manigault Newman as an attempt to get her back involved</p> <p>4 with the campaign?</p> <p>5 A Every person that was involved with the</p> <p>6 campaign signed an NDA.</p> <p>7 Q Okay.</p> <p>8 A So if she was asked to come back to the</p> <p>9 campaign, this would have been a document that she</p> <p>10 would sign.</p> <p>11 MR. STONEROCK: Sean, he's asking you about a</p> <p>12 different agreement, which is -- which is on the</p> <p>13 screen now. Can you see it?</p> <p>14 THE WITNESS: Oh. Correct. Okay.</p> <p>15 MR. STONEROCK: Do you need him to -- you</p> <p>16 know, if you need time to review it or you need him</p> <p>17 to --</p> <p>18 MR. PHILLIPS: Sure.</p> <p>19 MR. STONEROCK: -- make it larger on the</p> <p>20 screen, just let us -- let him know, and I'm sure</p> <p>21 he'll do it for you.</p> <p>22 THE WITNESS: It would be the standard</p> <p>23 Consulting Agreement.</p> <p>24 BY MR. PHILLIPS:</p> <p>25 Q Okay. And that would be the \$15,000 per month</p>

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1 offered to consultants by the campaign at that time?

2 MR. STONEROCK: Objection, misstates his

3 testimony, calls for speculation, lacks foundation.

4 BY MR. PHILLIPS:

5 Q Were other consultants offered a rate of

6 \$15,000 a month to consult with the campaign?

7 MR. STONEROCK: Vague as to time, relevance.

8 You can answer, Sean, if you know.

9 THE WITNESS: Are you asking if there were

10 other individuals that were paid \$15,000 a month

11 for the campaign?

12 BY MR. PHILLIPS:

13 Q As a consultant to the campaign around that

14 same time.

15 A Well, at that same time there was a very

16 limited amount of people working with the campaign.

17 Throughout time, yes.

18 Q Do you know why -- I'll put it this way. Do

19 you know why these -- these agreements are unsigned by

20 Omarosa Manigault Newman?

21 MR. STONEROCK: Calls for speculation, lacks

22 foundation.

23 You can answer, Sean, if you know.

24 THE WITNESS: I don't know.

25 BY MR. PHILLIPS:

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1 Q Okay. Do you know if she accepted a

2 reemployment with the campaign?

3 A I -- I did hear -- overhear that she did,

4 and then I was told she didn't.

5 Q Okay.

6 A But the context of it, no.

7 Q Have you ever heard the recorded phone call --

8 a recorded phone call between Lara Trump and Omarosa

9 Manigault Newman about this issue?

10 A Heard about the phone call or heard the phone

11 call, sir?

12 Q Either. So let's do heard about.

13 A Heard about, yes.

14 Q How did you hear about it?

15 A Like I said, there was a very limited amount

16 of people on the campaign, so I overheard Lara Trump

17 talking about it.

18 Q Okay. Did you hear the phone call? I believe

19 it was released to the media, is why I asked.

20 A No, sir.

21 Q Okay. 22, video. Let's go there.

22 (Playing video:)

23 LARA TRUMP: My sister-in-law, Ivanka Trump,

24 is an exceptional advocate for President Trump

25 and his policies, especially those empowering women

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1 and families across the country.

2 Her command of the issues and policies

3 improving the lives of millions of Americans was

4 evident when Ivanka participated in the UN General

5 Assembly in New York City and the Concordia Summit.

6 IVANKA TRUMP: A tax reform, obviously. Tax

7 reform is arising tideless all ships. And I think

8 what we're seeing in terms of economic growth,

9 women's unemployment is at the lowest level in 65

10 years, which is remarkable in and of itself.

11 But I think if you look at the personal side

12 of -- of tax reform and -- and what it's done for

13 working parents, which people will especially feel

14 next year as they fill out their tax forms, it --

15 it really recognizes the reality that -- that most

16 parents have to deal with, particularly single

17 parents, which are disproportionately women, so

18 doubling the child tax credit.

19 LARA TRUMP: In addition to the empowerment of

20 women through President Trump's unprecedented

21 economic record, Ivanka addressed the ways that the

22 administration is providing for the workforce of

23 tomorrow through education initiatives.

24 IVANKA TRUMP: And so the president very early

25 on prioritized for Secretary DeVos STEM education

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1 and computer science education. Simultaneously, he

2 made available a minimum of \$200 million in annual

3 grant funding to the states for computer science

4 education. And the guidance specified that that

5 grant funding had to strongly consider gender

6 and racial diversity because that is -- is a

7 problem, particularly getting -- getting younger

8 girls and minorities involved in -- in -- in STEM

9 education and STEM fields.

10 LARA TRUMP: President Trump is leading by

11 example, demonstrating his personal commitment to

12 the advancement of women by promoting women to

13 numerous senior level positions throughout his

14 administration.

15 And among his most senior advisors, Ivanka

16 Trump serves the president and the country with

17 honor, delivering a positive impact on women

18 and families throughout the nation.

19 (End of video.)

20 (Respondent's Exhibit 22 was identified and

21 later marked for identification.)

22 BY MR. PHILLIPS:

23 Q Do you know where campaign ad number 22 was

24 aired?

25 A I believe that was one that was digitally ran.

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1 Q Okay. And was there anything in there that
2 was specifically countermessaging to anything Omarosa
3 Manigault Newman said?
4 MR. STONEROCK: Objection, vague and ambiguous
5 as to specifically and countermessaging, incomplete
6 hypothetical, calls for speculation, lacks
7 foundation.
8 You can answer, Sean.
9 THE WITNESS: Just the same as before.
10 BY MR. PHILLIPS:
11 Q To repeat, before there was a general
12 narrative about Donald Trump and sexism, and these
13 commercials were designed to counteract that narrative;
14 is that fair?
15 A That there were -- yes, there was a narrative
16 in that -- in part Omarosa's narrative, public
17 narrative, of what she said.
18 Q Can you identify what part? Teeny-tiny or
19 huge?
20 A What part of the ad or --
21 Q What part -- what part did she contribute to
22 that narrative?
23 A I don't think I could come up to a full part.
24 I don't have that position.
25 Q Okay. You would be speculating to figure out

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1 what part she played in that overall narrative;
2 correct?
3 A From the information provided me, yes.
4 Q Okay. Do you know what part Donald Trump
5 played into the narrative that he indeed was a sexist,
6 or had sexist tendencies?
7 MR. STONEROCK: Objection, calls for
8 speculation, lacks foundation, argumentative.
9 You can answer it if you know, Sean.
10 THE WITNESS: I do not.
11 BY MR. PHILLIPS:
12 Q Okay. 23, second to last.
13 (Playing video:)
14 JACK BREWER: I was a big Obama supporter.
15 It's okay to be an Obama and a Trump supporter
16 because President Trump literally created the best
17 job market and economy for black Americans
18 and Americans of all races.
19 Joe Biden's America was mass incarcerating
20 black men. President Trump set them free.
21 President Trump believes in rehabilitation, not
22 just incarceration. He wants everyone in America
23 to have the opportunity towards success. That's
24 the type of president that we need.
25 DONALD J. TRUMP: I'm Donald J. Trump and I

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1 approve this message.
2 (End of video.)
3 (Respondent's Exhibit 23 was identified and
4 later marked for identification.)
5 BY MR. PHILLIPS:
6 Q And I think we've covered -- anything in that
7 one that you can see is specifically countering any
8 messaging by Omarosa Manigault Newman?
9 MR. STONEROCK: Objection, vague and ambiguous
10 as to specifically and countering any message.
11 You can answer, Sean, if you have an opinion.
12 THE WITNESS: I don't have an opinion.
13 BY MR. PHILLIPS:
14 Q There was a Fox News article dated June 15,
15 2020 where Jack Brewer, the subject of that commercial,
16 says it was disturbing for Biden to call Trump a
17 racist.
18 Would news media, including Fox News media,
19 have also been a part of the narrative of whether or
20 not Trump was a racist?
21 MR. STONEROCK: Calls for speculation, lacks
22 foundation, incomplete hypothetical, vague as to
23 time.
24 You can answer, Sean.
25 THE WITNESS: I don't -- I don't really have a

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1 comment on it.
2 BY MR. PHILLIPS:
3 Q Okay. But if Fox News was broadcasting
4 conversations with Jack Brewer about Trump being a --
5 whether or not Trump was a racist, and actually
6 defending him that he's not a racist, wouldn't that
7 have continued the narrative even as late as June of
8 2020 that there was this discourse in America about
9 whether or not Trump was a racist?
10 MR. STONEROCK: Calls for speculation, lacks
11 foundation, incomplete hypothetical.
12 You can answer.
13 THE WITNESS: I -- I believe he was saying
14 that he wasn't a racist; correct?
15 BY MR. PHILLIPS:
16 Q Correct. I think he was saying Biden was
17 saying he was a racist, the president now, the
18 president, candidate at the time.
19 But, again, I'm -- is there a way to determine
20 how much Biden's comments about whether or not Trump
21 was a racist warranted, you know, commercials by the
22 campaign on -- you know, featuring African Americans
23 saying Donald Trump's not racist?
24 MR. STONEROCK: Calls for speculation, lacks
25 foundation, incomplete hypothetical.

<p style="text-align: right;">Page 169</p> <p>1 You can answer, Sean.</p> <p>2 THE WITNESS: Biden at the time was Candidate</p> <p>3 Biden, so any type of negative attack on the</p> <p>4 campaign would have -- I mean, he would have been</p> <p>5 the one giving negative attacks on the campaign,</p> <p>6 so . . .</p> <p>7 BY MR. PHILLIPS:</p> <p>8 Q Last but not least, at least the ones produced</p> <p>9 to me last night, was candidate ad --</p> <p>10 MR. STONEROCK: It wasn't last night, John.</p> <p>11 It was yesterday afternoon.</p> <p>12 MR. PHILLIPS: The day before -- yeah,</p> <p>13 yesterday. I didn't get to them until last night</p> <p>14 because I was out of town.</p> <p>15 (Playing video:)</p> <p>16 UNKNOWN SPEAKER: To me Trump is a freaking</p> <p>17 godsend. To me Trump is what is -- is -- is life.</p> <p>18 To me Trump is a second chance. So when you say</p> <p>19 he's -- he's uh, I'm, like, naw, dude, he's way</p> <p>20 more than that, he's way more than that.</p> <p>21 You see, I -- I don't have the luxury to worry</p> <p>22 about freaking Rowe versus Wade. I have no -- I</p> <p>23 don't have the luxury to worry about that. I'm too</p> <p>24 busy trying to keep my family fed to think about</p> <p>25 that. And for the first goddamn time in my life, I</p>	<p style="text-align: right;">Page 171</p> <p>1 talk to them. They're workers like me who didn't</p> <p>2 care about politics. They didn't even think about</p> <p>3 politics. They didn't even want to talk about</p> <p>4 politics.</p> <p>5 I've got -- I've got people that I work with</p> <p>6 on a daily basis saying: Yo, man, we gotta do</p> <p>7 something.</p> <p>8 Thank you, man. Thank you for unlocking me.</p> <p>9 Thank you for unlocking other people. Because had</p> <p>10 I stayed asleep, ain't no telling what would have</p> <p>11 happened, man. Ain't -- ain't no telling. I just</p> <p>12 want to say thank you, man.</p> <p>13 I know this video is long as hell, but I</p> <p>14 needed to show you this so you can see this is what</p> <p>15 I'm fighting for, just to be able to take care of</p> <p>16 my family. I'm fighting for my family. I'm voting</p> <p>17 for my family.</p> <p>18 DONALD J. TRUMP: Go to the voting booth</p> <p>19 and vote early and in person. Don't let them take</p> <p>20 your vote away. The most important election we've</p> <p>21 ever had. Thank you.</p> <p>22 (End of video.)</p> <p>23 (Respondent's Exhibit 24 was identified and</p> <p>24 later marked for identification.)</p> <p>25 BY MR. PHILLIPS:</p>
<p style="text-align: right;">Page 170</p> <p>1 actually see a way out, I see a way out. Something</p> <p>2 I've never seen before. I see a way out, man.</p> <p>3 And just that little bit of hope is enough for</p> <p>4 me to have a fire in my belly powerful to freaking</p> <p>5 charge the goddamn world, man. I'm ready to take</p> <p>6 over. But if Biden gets in office, man, I don't</p> <p>7 know what I'm gonna do.</p> <p>8 So I'm saying thank you to you because you</p> <p>9 unlocked me, and I'm sure you unlocked a lot of</p> <p>10 people. There is a silent majority out there, man.</p> <p>11 I talk to them every day.</p> <p>12 I just came out of -- I went to an -- I work</p> <p>13 for mostly Arabs. Right? I went to an Arab</p> <p>14 place -- right -- and I asked him: Who -- who are</p> <p>15 you voting for, you know, that's safe?</p> <p>16 And he said: Trump.</p> <p>17 And I was like, I could have hugged him so</p> <p>18 hard.</p> <p>19 And he's like: Hey (makes noises).</p> <p>20 And I was like: I'm sorry. I'm just so</p> <p>21 excited to hear you say that because I was nervous,</p> <p>22 because all I see is Biden signs everywhere I go.</p> <p>23 And I'm like, please, Lord, don't let this guy win.</p> <p>24 You know what I'm saying?</p> <p>25 But there is a silent majority out there. I</p>	<p style="text-align: right;">Page 172</p> <p>1 Q Was that ad paid for by Donald J. Trump for</p> <p>2 President?</p> <p>3 A Yes.</p> <p>4 Q Okay. It says that in the ad.</p> <p>5 And do you know where that was featured or</p> <p>6 promoted or aired?</p> <p>7 A Digital.</p> <p>8 Q Do you know where digital?</p> <p>9 A YouTube.</p> <p>10 Q Okay. Did that ad strike -- I mean, again,</p> <p>11 it -- was that ad racist? Do you have an opinion as to</p> <p>12 whether that ad was racist?</p> <p>13 A Was the ad racist?</p> <p>14 Q Yeah.</p> <p>15 A No, sir.</p> <p>16 Q Or did the individual in the ad express</p> <p>17 racially insensitive views as paid for by Donald J.</p> <p>18 Trump for President?</p> <p>19 MR. STONEROCK: Objection, argumentative.</p> <p>20 You can answer.</p> <p>21 THE WITNESS: No, sir.</p> <p>22 BY MR. PHILLIPS:</p> <p>23 Q Okay. Did we refer -- okay.</p> <p>24 Did -- did Donald J. Trump for President</p> <p>25 really pay for an ad that -- that used the Lord's name</p>

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1 in vain twice?

2 MR. STONEROCK: Objection, argumentative,
3 irrelevant, misstates the video.

4 BY MR. PHILLIPS:

5 Q Did you hear goddamn twice in that video?

6 A Are you asking me, sir?

7 Q Yeah.

8 A I heard once, but I didn't hear the second
9 time.

10 Q I mean, I can replay it. Once or twice.

11 A It's really not necessary.

12 Q Was there -- I mean, do you know whether you
13 lost votes or the Trump campaign lost votes because
14 you're paying to air an add that uses the Lord's name
15 in vain?

16 MR. STONEROCK: Objection, argumentative,
17 irrelevant, calls for speculation, lack of
18 foundation, incomplete hypothetical.

19 You can answer, Sean, if you know.

20 THE WITNESS: I do not know.

21 MR. PHILLIPS: Let's do this. We've gone a
22 while. I'm gonna try to get coordinated to end.
23 I've still got, you know, a couple of sections
24 left. But, you know, my intention is to not go,
25 you know, past -- past 4:00 or 5:00 o'clock. We'll

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1 get where we're -- where we're gonna get.

2 But let's take a break until 2:00, and that
3 will speed me up so that you're not waiting on me
4 to get ready for the next section; is that fair?

5 MR. STONEROCK: So it's 1:00 o'clock now?

6 MR. PHILLIPS: 1:50.

7 MR. STONEROCK: Oh. So you want a 10-minute
8 break?

9 MR. PHILLIPS: A 10-minute break.

10 MR. STONEROCK: Yeah, yeah, that's fine with
11 me.

12 Sean?

13 THE WITNESS: Sounds good.

14 MR. PHILLIPS: Okay. We'll see y'all about
15 right at 2:00.

16 MR. STONEROCK: Okay.

17 (Break from 1:50 p.m. to 2:00 p.m.)

18 MR. PHILLIPS: If we're ready, we'll get back
19 on at 2:00 o'clock.

20 BY MR. PHILLIPS:

21 Q Mr. Dollman, I lost my cheat sheet, so, sorry.

22 Did -- was there a complaint made with the
23 FEC, the Federal Election Commission, related to
24 American Made Media Consultants that worked with the
25 campaign?

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1 MR. STONEROCK: Objection, relevance.

2 You can answer, Sean.

3 THE WITNESS: Yes, sir.

4 BY MR. PHILLIPS:

5 Q Do you know what the status of that complaint
6 is?

7 MR. STONEROCK: Same objection.

8 BY MR. PHILLIPS:

9 Q Do you know what the current status of that
10 complaint is?

11 A What do you -- I mean, it's still in process,
12 sir.

13 Q What is Jared Kushner's involvement with AMMC?

14 MR. STONEROCK: Objection, relevance, calls
15 for speculation, lacks foundation.

16 John, what's the relevance of this to -- to
17 any claimed defense in the litigation? Because, I
18 mean, obviously there's an FEC complaint pending,
19 so you can understand how I would be reluctant to
20 allow Sean to testify about it. So I don't know --

21 MR. PHILLIPS: I'm not -- I'm not getting into
22 the complaint. There -- there -- you know, it's
23 our standpoint that anything going into the
24 election -- and there was media -- negative media
25 from July to December of 2020 regarding

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1 improprieties within the campaign related to --

2 MR. STONEROCK: Somebody is scratching. Sorry
3 to interrupt, John. I don't know what that is.

4 MR. PHILLIPS: It might have been my paper.
5 Sorry.

6 It goes as to improprieties related to the
7 campaign, negative press related to the campaign.
8 Again, I'm kind of guessing at what the damages are
9 gonna be or how they're gonna be assessed.

10 But to me, to us, all of the negative
11 publicity that went into the campaign led to the
12 ultimate defeat of Donald Trump, and you can't
13 piece out what Omarosa said on -- on a Tuesday as
14 the ultimate reason Donald Trump lost.

15 And so when we're getting into impropriety,
16 whether it's the Mueller investigation, whether
17 it's the double impeachment, whether it's Ukraine,
18 or whatever -- and I'm not getting into all that --
19 but it's -- it's how we've never really been able
20 to figure out how breach turns to damages here.

21 MR. STONEROCK: Yeah. Well, what does -- what
22 does Jared Kushner's involved with American Made
23 Media have to do with any of that?

24 MR. PHILLIPS: Well, the -- as I understand
25 it -- and this is what I'm not planning on getting

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1 much into -- but as I understand it, the argument
2 is that American Made Media was a shell corporation
3 and was actually paying contracts, like the one
4 offered to Omarosa Manigault Newman, of \$15,000 a
5 month. At least that's what the articles in front
6 of me say, that it was used as a slush fund,
7 including paying Lara Trump and others as a -- as a
8 conduit that it avoided the FEC public records
9 disclosures. So it certainly ties directly related
10 to this case.

11 My question was fairly simple, because I don't
12 want to get into the end of that complaint or
13 Fifth Amendment stuff. You know, it was a -- it
14 was a precursor question about, you know, what was
15 Jared Kushner's involvement with AMMC on the
16 surface level.

17 MR. STONEROCK: I still don't understand the
18 relevance. You know, I -- I -- I'm happy to go off
19 the record. John, I wouldn't normally do this
20 while a question is pending. But I just want to
21 make sure this doesn't involve anything that
22 relates to the FEC complaint --

23 MR. PHILLIPS: Yes.

24 MR. STONEROCK: -- because I'm not handling
25 that matter. Do you want me to go --

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1 MR. PHILLIPS: Sure.

2 MR. STONEROCK: Okay. So let's -- let's go --
3 let go off the record, and then I'll -- I'm gonna
4 get --

5 MR. PHILLIPS: Did you mute?

6 THE WITNESS: I think you muted early, Ryan.

7 MR. STONEROCK: Oh, I muted too soon.

8 So I'm going to go off the record. Sean, can
9 you do the same? And then just, you know, turn
10 your video and your -- and mute your -- your audio
11 and we can discuss it.

12 And we'll be right back, John.

13 MR. PHILLIPS: Well, hold on. Let's do this.
14 Let me -- let me kind of proffer my questions, if
15 you will, so we're not doing this again.

16 MR. STONEROCK: Okay. Great.

17 MR. PHILLIPS: My questions, essentially, will
18 be, you know, what role, if any, did -- did Jared
19 Kushner have with AMMC? Was there a conversation
20 related to who was gonna pay Omarosa \$15,000 a
21 month? And then, essentially, one that
22 acknowledges for Mr. Dollman that he's been a part
23 of -- I think we're calling it a narrative, a
24 negative narrative, related to Donald Trump that --
25 that existed prior to election day.

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Those are, basically, the three things.

MR. STONEROCK: Okay. So give us two minutes.

MR. PHILLIPS: Okay.

MR. STONEROCK: Thank you.

(Break from 2:06 p.m. to 2:08 p.m.)

MR. STONEROCK: All right. Was that quick
enough, John? I think Sean's coming back right
now.

MR. PHILLIPS: Yes. Great.

MR. STONEROCK: Okay. So you can go ahead
and ask those three questions, John.

MR. PHILLIPS: Okay.

BY MR. PHILLIPS:

Q Hi, Mr. Dollman.

A Hello.

Q What -- what -- what role, if any, did Jared
Kushner have with AMMC?

MR. STONEROCK: Objection, relevance.

You can answer, Sean.

THE WITNESS: My -- my fault, Ryan. I jumped
over you.

He did not have a role in AMMC.

BY MR. PHILLIPS:

Q Okay. There's an article that states that he
approved the creation of AMMC, and spent half of the

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1 campaign's \$1.26 billion war chest. And I understand
2 this may need lead to a side conversation. But do you
3 dispute the veracity of that statement?

MR. STONEROCK: Objection, relevance.

THE WITNESS: I believe there's been a lot of
false reporting about AMMC.

BY MR. PHILLIPS:

Q Okay. Lara Trump and Mike Pence's -- is it
nephew or son John Pence?

A Well, it's also part of that article that is
false. It is his nephew.

Q It is his nephew?

A So credibility.

It's his nephew.

Q Okay. I thought -- I thought you told me son.

You may -- you may have said nephew earlier.

MR. STONEROCK: He said nephew.

MR. PHILLIPS: Okay. Very good.

THE WITNESS: The article says son.

BY MR. PHILLIPS:

Q This one I'm looking at says nephew.

A Oh.

Q So -- which makes sense.

But Lara Trump and John Pence appeared in a
campaign ad produced by -- or distributed by AMMC; is

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1 that correct?

2 MR. STONEROCK: Objection, misstates his
3 testimony, vague and ambiguous as to produced
4 and distributed.
5 Sean, you can answer if you understand the
6 question.

7 THE WITNESS: Yes.
8 BY MR. PHILLIPS:

9 Q They -- and help me understand produced
10 and distributed. I don't want to put words in your
11 mouth. That commercial that I'm referring to that has
12 John Pence and Lara Trump, what was AMMC's role in it?
13 A Hiring the subcontractor to put the videos
14 together. That would be the production side of it,
15 obviously.

16 Q Okay.

17 A Also, to shoot the videos.
18 And then the digital placement would be the
19 platform that the ads ran on.

20 Q Okay. Do Lara Trump, John Pence, and yourself
21 serve as board members of AMMC?

22 MR. STONEROCK: Objection.

23 What's the relevance of this question, John?
24 This is not what you told -- told us you were gonna
25 ask.

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1 MR. PHILLIPS: Right. I said if y'all need to
2 go back off.

3 BY MR. PHILLIPS:

4 Q I'm -- I'm trying to understand -- and, again,
5 it's -- and the next question is the question that I
6 was gonna go back to. And let me just go there.

7 MR. STONEROCK: Your papers are scratching
8 like crazy, John.

9 MR. PHILLIPS: Sorry, sorry. It's because
10 it's right over my microphone.

11 BY MR. PHILLIPS:

12 Q Do you agree with me, Mr. Dollman, that --
13 that even your name has been associated in a negative
14 light prior to the election that the campaign was
15 focused on winning?

16 A I would say that there were negative articles
17 about an entity, yes.

18 Q Okay. Do you know what, if any, effect that
19 had on the results from the presidential election
20 involving Donald J. Trump?

21 MR. STONEROCK: Objection, calls for
22 speculation, lacks foundation.

23 You can answer, Sean.

24 THE WITNESS: I believe a lot of false
25 reporting influences an election, yes.

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1 BY MR. PHILLIPS:

2 Q Okay. Very good.

3 Have you ever read The Fifth Risk?

4 A No, sir.

5 Q Do you know if this had any effect on the
6 results of the presidential election?

7 MR. STONEROCK: Calls for speculation, lacks
8 foundation.

9 BY MR. PHILLIPS:

10 Q Do you know?

11 A No, sir.

12 Q Fire and Fury by Michael Wolff, do you know if
13 this had any effect on the results of the 2020
14 presidential election?

15 MR. STONEROCK: Same objection.

16 THE WITNESS: I do not, sir.

17 BY MR. PHILLIPS:

18 Q Fear by Mr. Bob Woodward, do you know if this
19 book had any effect on the results of the 2020
20 presidential election?

21 MR. STONEROCK: Same objection.

22 You can answer, Sean.

23 THE WITNESS: No, I don't. I -- no, I do -- I
24 do not know.

25 BY MR. PHILLIPS:

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1 Q Okay. Do you know in -- in -- in at least
2 related to Fear whether there's claims about Donald
3 Trump being a racist discussed in that book?

4 MR. STONEROCK: Calls for speculation, lacks
5 foundation.

6 THE WITNESS: Who -- who wrote Fear?

7 BY MR. PHILLIPS:

8 Q Bob Woodward.

9 A No --

10 Q Okay.

11 A -- I do not.

12 Q Boom, boom, boom. Okay. Let me go to Exhibit
13 25, I believe.

14 Can you see that, the document on the screen?

15 A No, sir. All I see is the folder with the --

16 Q Okay. That's what I was afraid of.

17 Let me go back out and go back to share my
18 desktop. I knew I should have taken one of those handy
19 dandy Zoom for lawyers classes. Desktop. Eric Rose
20 report. Expand.

21 Now can you see a document?

22 A Yes, sir.

23 (Respondent's Exhibit 25 was identified and
24 later marked for identification.)

25 BY MR. PHILLIPS:

<p style="text-align: right;">Page 185</p> <p>1 Q Okay. There are 298 comments, statements, 2 publications, writings in a book by Omarosa Manigault 3 Newman that she has been sued over. 4 Do you know who keeps track of Omarosa's 5 statements? 6 MR. STONEROCK: Calls for speculation, lacks 7 foundation, calls for attorney work product 8 and attorney-client communication. 9 You can know -- you can testify, Sean, to 10 anything that's beyond any discussions with counsel 11 or anything you learned from counsel. 12 THE WITNESS: No, sir. 13 BY MR. PHILLIPS: 14 Q Okay. Can you see a page 21 with a -- with a 15 number 1? 16 A Yes, sir. 17 Q For each of these statements, I'm gonna ask 18 you a couple questions. I guess, let me start by doing 19 this. 20 Did you sign the same NDA as -- as Omarosa 21 Manigault Newman? 22 MR. STONEROCK: Calls for speculation, lacks 23 foundation, relevance. 24 You can answer, Sean. 25 THE WITNESS: Yes, sir.</p>	<p style="text-align: right;">Page 187</p> <p>1 understanding. 2 THE WITNESS: I would think any -- I -- my 3 theory is, like, if you have a question on the 4 NDAs, you probably speak with legal counsel, so 5 most of the time I would speak with legal counsel 6 beforehand. But I also don't publicly discuss 7 anything that was going on with the campaign. 8 BY MR. PHILLIPS: 9 Q Okay. What is your understanding -- and I'm 10 looking at page 2, number 2, of the -- what is your 11 understanding as it relates to you or it relates to the 12 campaign about the No Disparagement clause in the 13 subject agreement? 14 MR. STONEROCK: Objection, calls for a legal 15 conclusion. 16 You can testify to your understanding, if you 17 have one, Sean. 18 THE WITNESS: I would say negative -- negative 19 comments and disparaging the president, the family, 20 or family members or company, obviously, publicly. 21 So that would be my interpretation of that. 22 BY MR. PHILLIPS: 23 Q Okay. Now I'm going back to the summary of 24 the statements. Have you -- what Ms. Omarosa -- Ms. 25 Manigault Newman needs an understanding of is whether</p>
<p style="text-align: right;">Page 186</p> <p>1 BY MR. PHILLIPS: 2 Q Okay. What is your understanding as to the 3 prohibition in that NDA as it relates to disclosing 4 confidential information? 5 MR. STONEROCK: Objection, calls for a legal 6 conclusion. 7 Do you want to put the NDA in front of him, 8 John, or -- 9 MR. PHILLIPS: Do you want the NDA? I was 10 just asking for his understanding. But we can do 11 that real quick. This would be Ms. Manigault 12 Newman's NDA. I really wish -- I just did auto 13 accept all requests, so you might be able to 14 control it now if you get a . . . 15 BY MR. PHILLIPS: 16 Q But, you know, related to the NDA that -- that 17 you signed, what's your understanding of a person's -- 18 a signatory, I guess, of -- of -- of that obligation to 19 not disclose confidential information? What's your 20 understanding? Not -- not -- not legal terms, but 21 what -- what is your understanding of that obligation? 22 MR. STONEROCK: Objection, calls for a legal 23 conclusion. You can ask him for his understanding, 24 but you're still asking him for a legal conclusion. 25 Sean, you can testify if you have an</p>	<p style="text-align: right;">Page 188</p> <p>1 each of these statements is -- is -- is there a claim 2 that she breached confidentiality or she breached the 3 disparage language? Do you know as to that first 4 statement whether the campaign contends Omarosa 5 breached confidentiality, disparagement, or both? 6 MR. STONEROCK: John? 7 MR. PHILLIPS: Yes. 8 MR. STONEROCK: A couple things. This is -- 9 where are you pulling this from? Because this is 10 not -- I don't believe this is our statement of 11 claim. 12 MR. PHILLIPS: This is from Rose's -- this is 13 from Rose's report. 14 MR. STONEROCK: Oh, from Eric Rose's report. 15 Okay. Got it. 16 And then we produced to -- I believe, to the 17 -- to -- to your office whether or not -- you know, 18 a chart that says whether or not each statement -- 19 which provision each statement violates. 20 So, I mean, I'm not sure you want to spend 21 your time going through, you know, each one of 22 these. 23 MR. PHILLIPS: Okay. 24 MR. STONEROCK: But, you know, I'd like to at 25 least be able to put that statement in front of</p>

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1 Sean so that, you know -- so that he can review it
2 before he answers these questions.
3 MR. PHILLIPS: Maybe -- maybe -- maybe we'll
4 do that because --
5 MR. STONEROCK: Because, I mean, you're asking
6 him for a legal conclusion. And, you know, we've
7 -- like I said, we've already given you, you know,
8 which provision -- a chart with which provision we
9 contend violates -- is violated by each of these
10 statements. So I'm not sure that we need to go
11 through this process, but . . .

12 BY MR. PHILLIPS:

13 Q Let me ask this. And this is the first time,
14 and only time, I get to depose a representative of the
15 campaign. So can you tell me, Mr. Dollman, how the
16 comments in 1, number 1, damaged the campaign?

17 MR. STONEROCK: Objection, calls for a legal
18 conclusion, calls for expert witness testimony,
19 calls for attorney work product.

20 You can answer, Sean, if you -- if you have an
21 opinion.

22 THE WITNESS: I mean, it was a part of the
23 book -- right -- so it's a public facing, which is
24 -- it also looks like it's in quotations. So those
25 are statements made by the president, or, at the

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1 time, Donald Trump. So I would probably, in my
2 mind, say it's against the NDA.

3 If that wasn't your question, John, I
4 apologize.

5 BY MR. PHILLIPS:

6 Q That's okay.
7 My question was, how did it damage the
8 campaign?

9 A Yeah. I mean, it -- it -- it looks like a --
10 MR. STONEROCK: Sorry, sorry. I was on mute.

11 Same objections, calls for -- calls for a
12 legal conclusion, calls for attorney work product
13 information, calls for the premature disclosure of
14 expert witness testimony.

15 You can answer, Sean.

16 THE WITNESS: I mean, it -- it -- it looks
17 like she's trying to label him as a -- as a sexist.

18 BY MR. PHILLIPS:

19 Q Are those comments very different from the --
20 from the videos that I showed you where Donald Trump
21 bragged about going and seeing women in -- in -- in a
22 beauty contest, naked, and -- and judging them? I
23 mean, how -- how -- why can -- how did it damage the
24 campaign if Donald can say it but Omarosa cannot? Why
25 does Omarosa's statement be the one that damages the

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1 campaign?

2 MR. STONEROCK: There are about three
3 questions in there.

4 MR. PHILLIPS: Yeah, that last one is the
5 operative question. Sorry.

6 BY MR. PHILLIPS:

7 Q How did -- how is it that Omarosa's statement
8 is the one that damages the campaign and not Donald
9 Trump's admission of similar statements?

10 MR. STONEROCK: Objection, misstates the
11 record, misstates Mr. Trump's statements, calls for
12 a legal conclusion, calls for expert testimony.

13 You can answer it, Sean, if you have an
14 opinion.

15 THE WITNESS: Yeah, I think we've discussed it
16 a few times that I am not a lawyer. So,
17 personally, I would think that it -- it -- you
18 know, she signed an NDA that -- that she would not
19 be doing it and going out publicly and making these
20 statements.

21 BY MR. PHILLIPS:

22 Q Okay. And whether or not she's in breach is
23 a -- is a determination for lawyers in federal court.

24 Let me ask this. Did you read the federal
25 court opinion that was issued by the Southern District

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1 of New York essentially invalidating one of these NDAs?
2 Did you read that? It was issued yesterday.

3 A Are you asking me, sir? No, I didn't.

4 Q Okay. So the -- the -- the validity of it is
5 separate. I just want to know, as the CFO of the
6 campaign and former director of operations, how -- how
7 any of the statements in 1 caused actual damages.

8 MR. STONEROCK: Objection, calls for a legal
9 conclusion, calls for expert testimony.

10 You can answer, Sean, if you have an opinion.

11 THE WITNESS: No, I don't have an opinion.

12 BY MR. PHILLIPS:

13 Q Okay. The same for 2. And we can have
14 standing objections. But my question is gonna be how
15 did this statement cause damages? For each and every
16 one of these --

17 MR. STONEROCK: Objection.

18 BY MR. PHILLIPS:

19 Q -- how did this statement cause damages?

20 MR. STONEROCK: Objection. I think it's
21 unfair to take one statement out and -- and isolate
22 it when you have an entire book and -- and many
23 media appearances were that were made by Ms.
24 Manigault Newman.

25 So I'm gonna object on vague and ambiguous

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1 grounds, legal conclusion, attorney work product,
2 calls for expert testimony.
3 BY MR. PHILLIPS:
4 Q Number 2, how did that damage the campaign?
5 MR. STONEROCK: Same objections.
6 THE WITNESS: Am I -- am I able -- I -- I
7 don't have an opinion on it.
8 BY MR. PHILLIPS:
9 Q Okay. Number 3, how did that damage the
10 campaign?
11 MR. STONEROCK: Same objections.
12 THE WITNESS: No opinion.
13 BY MR. PHILLIPS:
14 Q Is the fact that Trump made no secret of his
15 appreciation of beautiful women -- strike that. We'll
16 address that later.
17 Number 4, how did that damage the campaign?
18 MR. STONEROCK: Same objections, calls for a
19 legal conclusion, calls for attorney-client work
20 product, and a premature disclosure of expert
21 witness testimony.
22 BY MR. PHILLIPS:
23 Q You can answer, Mr. Dollman.
24 A Yeah. I'm not the quickest reader, John. I
25 apologize.

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1 Q Sorry, sorry, sorry.
2 A I mean, there's a -- there's a lot of personal
3 information about family in here. I think the damages
4 to the campaign for this one, and then -- and then
5 possibly others within the book, is -- like I said
6 before, is Omarosa was more of a -- had more of a
7 relation, or an inside relation, with Mr. Trump and the
8 family, and this book in her eyes wanted to give
9 credibility to any type of thought or -- or belief in
10 individuals' minds.
11 Q Right. And I understand that. And I'm just
12 trying to figure out from a perspective of the CFO if
13 there was any economic damage from such a discussion as
14 number 4. And I don't mean to short summarize it, but
15 it talks about Karen McDougal and Stormy Daniels, two
16 names that involved, for that period, daily, weekly,
17 you know, media consumption.
18 And -- and, I guess, my question is how did --
19 how can the campaign attribute Omarosa's statement in 4
20 to damaging the campaign rather than something Stormy
21 Daniels said or did?
22 MR. STONEROCK: Objection, calls for a legal
23 conclusion, calls for expert testimony, calls for
24 attorney work product.
25 You can answer, Sean, if you understand the

question.
THE WITNESS: I think all of it -- right --
creates a -- some type of damages. And trying to
get the pinpoint dollar amount that was attributed
to an individual, or individuals, it is difficult.
But that's why we ran the ads as well as -- that's
part of the damages -- right -- so we had to run
those ads in order to correct the narrative.
BY MR. PHILLIPS:
Q But did -- did -- do you recall Stormy Daniels
talking about Donald Trump having a mushroom-shaped
penis or that being released because of her book?
MR. STONEROCK: Objection, relevance.
BY MR. PHILLIPS:
Q Do you recall that being out in public
consumption?
MR. STONEROCK: Vague as to public
consumption.
You can answer, Sean, if you remember.
THE WITNESS: I do not.
BY MR. PHILLIPS:
Q But would Stormy Daniels' book and discussions
about her intimate life with Donald Trump be the
damages, or would saying we all know about Stormy
Daniels be the damages? I don't understand.
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1 And what I'm trying to understand -- we get
2 one shot at this. It's the only campaign rep I get,
3 and I got the CFO, so the person that's -- or -- or at
4 least the director of ops back at the time.
5 What I'm trying to understand is, is there any
6 way to put what was said in number 4 into a calculator
7 and say: Yes, we were damaged because of Omarosa
8 Manigault Newman because of this comment?
9 MR. STONEROCK: Calls for speculation, lacks
10 foundation, calls for a legal conclusion, calls for
11 expert witness testimony.
12 John -- John, we have an expert who you're
13 going to get to depose who's going to testify to
14 these issues. It's also vague as to the term
15 "calculator."
16 You can answer, Sean, if you understand the
17 question.
18 THE WITNESS: I -- I understand the question.
19 I don't have the -- I'm not familiar with any
20 polling that came out on or after the book or prior
21 to, so I really don't have a comment on the
22 damages --
23 BY MR. PHILLIPS:
24 Q Okay.
25 A -- for the campaign.

<p style="text-align: right;">Page 197</p> <p>1 Q Legally, would Ms. Manigault Newman be allowed</p> <p>2 to pay for corrective ads in support of a candidate</p> <p>3 under the Federal Election Commission guidelines?</p> <p>4 MR. STONEROCK: Objection, calls for a legal</p> <p>5 conclusion.</p> <p>6 THE WITNESS: Say -- say that again, please,</p> <p>7 sir.</p> <p>8 BY MR. PHILLIPS:</p> <p>9 Q Is -- is there a maximum amount that a person</p> <p>10 can give a -- a presidential political campaign?</p> <p>11 MR. STONEROCK: Objection, calls for a legal</p> <p>12 conclusion.</p> <p>13 You can answer, Sean.</p> <p>14 THE WITNESS: Yes, sir.</p> <p>15 BY MR. PHILLIPS:</p> <p>16 Q What is that?</p> <p>17 A As an individual to the campaign directly,</p> <p>18 \$2,800 --</p> <p>19 Q Okay.</p> <p>20 A -- per election.</p> <p>21 Q My understanding of Mr. Rose's opinion is Ms.</p> <p>22 Manigault Newman's negative comments were given</p> <p>23 heightened veracity because of her relationship with</p> <p>24 the president, which is something similar to what</p> <p>25 you've said, and it would be Mr. Rose's recommendation</p>	<p style="text-align: right;">Page 199</p> <p>1 BY MR. PHILLIPS:</p> <p>2 Q Moving on to number 5: Donald was obsessed</p> <p>3 with the ratings -- I guess this is the campaign's</p> <p>4 words -- of The Apprentice. I've heard that when the</p> <p>5 members -- when the numbers declined, he became</p> <p>6 apoplec- -- apoplectic. Then he'd do an interview and</p> <p>7 say that the show was still number one. Sound</p> <p>8 familiar?</p> <p>9 How did that comment damage the campaign?</p> <p>10 MR. STONEROCK: Objection, calls for a legal</p> <p>11 conclusion, calls for expert testimony.</p> <p>12 This -- this comment was a part of a -- of a</p> <p>13 book, many, many comments of which are -- are --</p> <p>14 violated the NDA.</p> <p>15 I'm not sure where you're going here, John.</p> <p>16 But, you know, if you -- Sean, if you have a</p> <p>17 personal understanding how -- as to how this</p> <p>18 specific statement, number 5, damaged the campaign,</p> <p>19 you can testify to it.</p> <p>20 THE WITNESS: No, not this specific one. I</p> <p>21 think collectively, as a whole.</p> <p>22 BY MR. PHILLIPS:</p> <p>23 Q Even collectively -- even collectively, as a</p> <p>24 whole, what -- what specific damage did Omarosa</p> <p>25 Manigault Newman do collectively, adding in everything</p>
<p style="text-align: right;">Page 198</p> <p>1 that Ms. Manigault Newman pay for the corrective ads,</p> <p>2 corrective statements, so that voters may -- because</p> <p>3 voters may continue to all belief about the president</p> <p>4 as a result of her statements.</p> <p>5 Now, I say that just generally summarizing his</p> <p>6 opinion to ask how Ms. Manigault Newman would pay for</p> <p>7 hundreds of thousands of dollars of -- of</p> <p>8 advertisements and still be -- and the campaign and her</p> <p>9 still be compliant with Federal Election Commission</p> <p>10 standards?</p> <p>11 MR. STONEROCK: Objection, calls for a legal</p> <p>12 conclusion.</p> <p>13 You will have a chance to ask Mr. Rose about</p> <p>14 this, John.</p> <p>15 Obviously, the campaign's over. These ads</p> <p>16 have already been paid for. There's -- there's no</p> <p>17 ability for -- for Omarosa, or Ms. Manigault</p> <p>18 Newman, to pay for any ads at this point, if that's</p> <p>19 a component of damages.</p> <p>20 We're not -- and you can ask Mr. Rose about</p> <p>21 this. But as far as I understand it, you know, the</p> <p>22 campaign is not actually asking for her to pay for</p> <p>23 those ads. It wouldn't even be possible. It's a</p> <p>24 -- it's a claim and component of damages.</p> <p>25 MR. PHILLIPS: Okay.</p>	<p style="text-align: right;">Page 200</p> <p>1 she's ever said negatively about Donald Trump, the</p> <p>2 Trump campaign, the Trump family, the Trump businesses,</p> <p>3 Pence businesses, whoever? What amount of dollars of</p> <p>4 damages has the campaign suffered?</p> <p>5 MR. STONEROCK: Calls for a legal conclusion,</p> <p>6 calls for expert testimony.</p> <p>7 You can answer, Sean.</p> <p>8 THE WITNESS: Yeah, collectively, like you</p> <p>9 said, there is a lot of public statements, John,</p> <p>10 that Omarosa said about the campaign, the family of</p> <p>11 Mr. Trump, Mr. Trump himself, and then, also,</p> <p>12 businesses or shows that he was on.</p> <p>13 Again, publicly she came out and said all</p> <p>14 that, so in turn we had to run ads that in part</p> <p>15 were because of her statements that gave more</p> <p>16 credibility to other news networks pushing a</p> <p>17 narrative.</p> <p>18 BY MR. PHILLIPS:</p> <p>19 Q Right. But at the exact same time you had an</p> <p>20 adult film star talking about the shape of Donald</p> <p>21 Trump's penis, you had lawsuits filed accusing Donald</p> <p>22 Trump of sexual assault or rape, you had an</p> <p>23 impeachment, you had the Mueller investigation, you had</p> <p>24 a host of other people, every network, saying,</p> <p>25 generally, something either negative about Trump or</p>

<p style="text-align: right;">Page 201</p> <p>1 saying something rehabilitating the image of Trump.</p> <p>2 And what I just want to know, is there one</p> <p>3 dollar of damages that you can point to and say this</p> <p>4 was because of something Omarosa Manigault Newman did</p> <p>5 -- Manigault Newman did specifically?</p> <p>6 MR. STONEROCK: Objection. That was a</p> <p>7 compound question on many levels. Calls for a</p> <p>8 legal conclusion, calls for expert testimony.</p> <p>9 Sean, you can answer if you understand the</p> <p>10 question.</p> <p>11 Vague as to time as well. Sorry.</p> <p>12 THE WITNESS: Yeah, I don't have a specific</p> <p>13 dollar amount that would go to any statement.</p> <p>14 BY MR. PHILLIPS:</p> <p>15 Q Is there any way to get one?</p> <p>16 A I would -- you know, to have the exact dollar</p> <p>17 amount that was allocated to her public statements, I</p> <p>18 -- I don't think it's possible to get an exact dollar</p> <p>19 amount. But like Ryan was saying earlier, the expert</p> <p>20 witness dove into it a little bit more, but it's</p> <p>21 difficult to actually pull the exact dollar amount.</p> <p>22 Q And I get that. And his deposition's next.</p> <p>23 And I get -- I get the position and professionalism</p> <p>24 with which -- with which you're, you know -- you're</p> <p>25 sitting there and answering these questions. I get it.</p>	<p style="text-align: right;">Page 203</p> <p>1 and every one of them and ask, essentially, two</p> <p>2 questions: Does this fall under the confidentiality or</p> <p>3 disparagement provisions of the agreement? And I'm --</p> <p>4 I'm taking Mr. Stonerock's word that that's all in a</p> <p>5 chart. I think there was some missing, but I don't --</p> <p>6 I don't care at this point. We'll deal with that with</p> <p>7 Mr. Rose.</p> <p>8 MR. STONEROCK: John, can I just -- I got</p> <p>9 information. It's in our interrogatory responses.</p> <p>10 MR. PHILLIPS: Okay. And maybe I'll take a</p> <p>11 break and pull that up. In fact, I think I have</p> <p>12 those in my queue.</p> <p>13 BY MR. PHILLIPS:</p> <p>14 Q But, you know, I think the answer, Mr.</p> <p>15 Dollman, that you've given me -- and I don't -- and,</p> <p>16 again, I'm not trying to belabor this. I would much</p> <p>17 rather have an hour less of questions. And I did the</p> <p>18 math at 298 times two minutes, which it takes me longer</p> <p>19 than two minutes and Ryan longer than two minutes to</p> <p>20 have a question and an objection, you know, that's --</p> <p>21 that's 500 minutes. That's more time than I have or</p> <p>22 that we need to spend.</p> <p>23 I say that to say is there -- is there any</p> <p>24 comment that you're aware of that you could point to</p> <p>25 that Omarosa said or published that has any specific</p>
<p style="text-align: right;">Page 202</p> <p>1 I appreciate it.</p> <p>2 And I think you appreciate, you know, my job</p> <p>3 as well, which is to try to figure out if I can put a</p> <p>4 number and a calculator that Omarosa caused as damages</p> <p>5 to the campaign, what -- what that number would be.</p> <p>6 And is there any number that the campaign is -- the CFO</p> <p>7 and former director of operations is aware of that was</p> <p>8 specifically and only caused by Omarosa Manigault</p> <p>9 Newman?</p> <p>10 MR. STONEROCK: Objection, calls for a legal</p> <p>11 conclusion, calls for expert testimony. You have</p> <p>12 an entire expert report that calculates -- that</p> <p>13 calculates that. I'm not sure where you're going</p> <p>14 with this, John.</p> <p>15 BY MR. PHILLIPS:</p> <p>16 Q Anything, Mr. Dollman?</p> <p>17 MR. STONEROCK: You can ask this in the</p> <p>18 deposition coming up, but . . .</p> <p>19 THE WITNESS: No. I think if we had a</p> <p>20 calculator to do that, it would make all of our</p> <p>21 lives a lot easier here.</p> <p>22 BY MR. PHILLIPS:</p> <p>23 Q Thank you.</p> <p>24 I have -- that's 5. I've got 293 more of</p> <p>25 these. And my intention was to go through each</p>	<p style="text-align: right;">Page 204</p> <p>1 damages that the campaign is aware of?</p> <p>2 MR. STONEROCK: Objection, calls for a legal</p> <p>3 conclusion, calls for expert testimony.</p> <p>4 You can answer if you understand it.</p> <p>5 THE WITNESS: I did -- so -- and like -- like</p> <p>6 I said, an individual statement is difficult. But,</p> <p>7 collectively, I did overhear, or was a part of,</p> <p>8 kind of in the background, of a meeting that did</p> <p>9 discuss putting out ads based off of these</p> <p>10 comments. I don't have in front of me the -- which</p> <p>11 ads, but I did overhear that discussion.</p> <p>12 BY MR. PHILLIPS:</p> <p>13 Q That there were ads needed as it relates to</p> <p>14 Omarosa Manigault Newman?</p> <p>15 A It was to correct the narrative, yes, sir.</p> <p>16 Q Okay. And we don't know what ads or how much</p> <p>17 were spent on those ads; is that fair?</p> <p>18 A I -- I -- I'm trying to dig through my brain</p> <p>19 on, like, when that time was, but I can't -- I could</p> <p>20 probably try to pull something. But that's -- that's</p> <p>21 fair to say as of right now I do not.</p> <p>22 Q Do you know who was at that meeting?</p> <p>23 A No, sir.</p> <p>24 Q If Donald Trump cheated on Melania with Stormy</p> <p>25 Daniels, would that make him an unfaithful husband?</p>

<p style="text-align: right;">Page 205</p> <p>1 MR. STONEROCK: Calls for speculation, lacks 2 foundation, incomplete hypothetical, argumentative, 3 irrelevant. 4 You can answer, Sean, if you know. 5 BY MR. PHILLIPS: 6 Q And I'm going to comment 32. Bear with me, 7 Sean, before you answer. Nope. That's the problem 8 with going off this report. Did Rose really do 9 something to set them up? He claimed he did. Oh, here 10 we go. He just put them in different categories. 11 So 32, right here, under -- he has category 2. 12 I've got to move my stuff to the page. Anyway, 32, 13 there's a statement in -- allegedly in Omarosa's book: 14 Melania, like Hillary, had an unfaithful husband 15 exposed in a very public space. And it goes on. And 16 it ends with: I don't think that Melania ever had an 17 expectation that Donald was going to be faithful. 18 Is this -- if -- if it's true that Donald 19 Trump cheated with Stormy Daniels while she was -- 20 while he was married to Melania Trump, isn't the fact 21 that he's an unfaithful husband a fact and not an 22 opinion? 23 MR. STONEROCK: Objection, calls for 24 speculation, lacks foundation, incomplete 25 hypothetical, argumentative, calls for a legal</p>	<p style="text-align: right;">Page 207</p> <p>1 conclusion. 2 You can answer, Sean, if you have an 3 understanding. 4 THE WITNESS: Yeah, I'm not -- I'm not a 5 lawyer, and I don't know if she waived her First 6 Amendment rights. 7 BY MR. PHILLIPS: 8 Q Are you aware of whether the subject NDA has 9 been struck down by a federal court? 10 MR. STONEROCK: Objection, calls for a legal 11 conclusion, vague as to struck down, incomplete 12 hypothetical. 13 You can answer, Sean, if you know. 14 THE WITNESS: I am not aware. 15 BY MR. PHILLIPS: 16 Q As of election day, do you know how many 17 pending lawsuits Donald Trump had pending against him? 18 MR. STONEROCK: Objection, relevance, calls 19 for speculation, lacks foundation. 20 You mean in his individual capacity, or 21 official capacity, or both? 22 MR. PHILLIPS: Both. 23 THE WITNESS: No, sir. 24 BY MR. PHILLIPS: 25 Q Do you know how many arbitration proceedings</p>
<p style="text-align: right;">Page 206</p> <p>1 conclusion, vague and ambiguous as to fact versus 2 opinion. 3 You can answer, Sean, if you have an 4 understanding of the question. 5 THE WITNESS: Yeah, I think I understand the 6 question. I don't -- I don't really have an 7 opinion on it. I think it's all done just 8 speculating on whether he was or wasn't. Right? 9 So -- 10 BY MR. PHILLIPS: 11 Q Okay. 12 A -- I don't have an opinion on that. 13 Q And do you know whether Omarosa had -- I mean, 14 strike that. 15 Do you know whether Donald Trump cheated on 16 Melania Trump? 17 MR. STONEROCK: Calls for speculation, lacks 18 foundation, irrelevant. 19 You can answer, Sean, if you know. 20 THE WITNESS: No, sir. 21 BY MR. PHILLIPS: 22 Q Did Omarosa -- as you understand it, as -- as 23 director of operations of the campaign, did Omarosa 24 waive her First Amendment rights by signing the NDA? 25 MR. STONEROCK: Objection, calls for a legal</p>	<p style="text-align: right;">Page 208</p> <p>1 the Trump campaign has ongoing? 2 MR. STONEROCK: Objection, relevance, calls 3 for a legal conclusion, calls for attorney work 4 product information, calls for attorney-client 5 communications. 6 You can answer if you know, Sean. 7 THE WITNESS: No, sir. 8 BY MR. PHILLIPS: 9 Q Do you know who Jessica Denson is? 10 A Yes, sir. 11 Q Who is Jessica Denson? 12 A She was a former staffer on the campaign in 13 2016. 14 Q Did she make comments which damaged the 15 campaign? 16 MR. STONEROCK: Objection, relevance. 17 John, this has nothing to do with our case. 18 You know, I'll probably let -- let Sean answer this 19 question if he -- if he knows. But I'm not gonna 20 let you go down -- too much further down this road. 21 MR. PHILLIPS: Because it's all Omarosa's 22 fault until it's not; right? I mean, I'm just 23 waiting for damages, Ryan. 24 MR. STONEROCK: Can you rephrase or -- or 25 repeat the question?</p>

<p style="text-align: right;">Page 209</p> <p>1 MR. PHILLIPS: Yeah, yeah.</p> <p>2 BY MR. PHILLIPS:</p> <p>3 Q Did Jessica Denson damage Donald J. Trump for</p> <p>4 President, Inc.?</p> <p>5 MR. STONEROCK: Calls for speculation, lacks</p> <p>6 foundation, calls for a legal conclusion, calls for</p> <p>7 expert testimony, irrelevant, incomplete</p> <p>8 hypothetical, vague as to time.</p> <p>9 You can answer, Sean, if you have an</p> <p>10 understanding.</p> <p>11 THE WITNESS: She did have negative comments</p> <p>12 publicly against the campaign and -- or Mr. Trump.</p> <p>13 BY MR. PHILLIPS:</p> <p>14 Q And what damages -- I guess what I'm trying to</p> <p>15 understand is how can we differentiate between her</p> <p>16 negative comments damaging the campaign and Omarosa's</p> <p>17 negative comments damaging the campaign?</p> <p>18 MR. STONEROCK: Same objections, calls for a</p> <p>19 legal conclusion, calls for expert testimony,</p> <p>20 incomplete hypothetical, calls for speculation,</p> <p>21 lacks foundation.</p> <p>22 You can answer, Sean, if you have an</p> <p>23 understanding.</p> <p>24 THE WITNESS: I don't have anything on that</p> <p>25 one.</p>	<p style="text-align: right;">Page 211</p> <p>1 differentiate, vague as to time, calls for a legal</p> <p>2 conclusion, calls for expert testimony, calls for</p> <p>3 attorney work product.</p> <p>4 Sean, you can answer if you have an</p> <p>5 understanding.</p> <p>6 THE WITNESS: I am not familiar with Cliff --</p> <p>7 Cliff Sims --</p> <p>8 BY MR. PHILLIPS:</p> <p>9 Q Okay.</p> <p>10 A -- as well.</p> <p>11 Q Do you know if Alva Johnson's arbitration</p> <p>12 action is still going on?</p> <p>13 MR. STONEROCK: Objection, relevance, calls</p> <p>14 for a legal conclusion, calls for attorney work</p> <p>15 product, calls for attorney-client communication.</p> <p>16 Sean, if you have an understanding outside of</p> <p>17 any correspondence you may have had with counsel,</p> <p>18 then you can testify to it.</p> <p>19 THE WITNESS: No, sir.</p> <p>20 BY MR. PHILLIPS:</p> <p>21 Q Okay. As of today, it looks like the campaign</p> <p>22 has paid Harder, LLC \$4,7 -- \$4,078,295.20. Do you</p> <p>23 know of that over \$4 million how many in attorney --</p> <p>24 how much in attorneys' fees are attributed to Omarosa</p> <p>25 Manigault Newman's case?</p>
<p style="text-align: right;">Page 210</p> <p>1 BY MR. PHILLIPS:</p> <p>2 Q Okay. Have you ever heard of Cliff Sims?</p> <p>3 A Yes, sir.</p> <p>4 Q Do you know how Cliff Sims' arbitration got</p> <p>5 resolved?</p> <p>6 MR. STONEROCK: Objection, relevance, calls</p> <p>7 for a legal conclusion, calls for confidential</p> <p>8 information.</p> <p>9 I'm not gonna allow the witness to answer.</p> <p>10 I'm gonna instruct the witness not to answer.</p> <p>11 MR. PHILLIPS: Okay.</p> <p>12 BY MR. PHILLIPS:</p> <p>13 Q Do you know what damages were caused to the</p> <p>14 campaign by Cliff Sims?</p> <p>15 MR. STONEROCK: Calls for a legal conclusion,</p> <p>16 calls for attorney work product, calls for expert</p> <p>17 testimony, incomplete hypothetical.</p> <p>18 Sean, you can answer if you know.</p> <p>19 THE WITNESS: I do not, sir.</p> <p>20 BY MR. PHILLIPS:</p> <p>21 Q Do you know how you can differentiate from the</p> <p>22 damages caused to the campaign by Cliff Sims from the</p> <p>23 damages caused by the campaign -- to the campaign</p> <p>24 allegedly by Omarosa Manigault Newman?</p> <p>25 MR. STONEROCK: Vague and ambiguous as to</p>	<p style="text-align: right;">Page 212</p> <p>1 MR. STONEROCK: Objection, relevance, calls</p> <p>2 for attorney work product information, calls for</p> <p>3 attorney-client communications.</p> <p>4 I'm going instruct the witness not to answer.</p> <p>5 MR. PHILLIPS: Okay.</p> <p>6 BY MR. PHILLIPS:</p> <p>7 Q The campaign has paid \$186,996.50 to the</p> <p>8 American Arbitration Association. Do you know what</p> <p>9 portion of that \$186,996.50 is attributable --</p> <p>10 attributable to Omarosa Manigault Newman's arbitration?</p> <p>11 MR. STONEROCK: Same objections.</p> <p>12 John, you can find that information out from</p> <p>13 AAA. It's not a difficult one.</p> <p>14 I'm gonna instruct the witness not to answer.</p> <p>15 MR. PHILLIPS: Okay.</p> <p>16 BY MR. PHILLIPS:</p> <p>17 Q As director of operations for Donald J. Trump</p> <p>18 for President, Inc., were you aware of allegations of</p> <p>19 sexual harassment or misconduct in the workplace at</p> <p>20 Donald J. Trump for President, Inc.?</p> <p>21 MR. STONEROCK: Objection, relevance.</p> <p>22 Objection, calls for attorney work product</p> <p>23 information, calls for attorney-client</p> <p>24 communications, calls for confidential information</p> <p>25 of employees and/or contractors of the campaign.</p>

<p style="text-align: right;">Page 213</p> <p>1 I'm gonna instruct the witness not to answer.</p> <p>2 BY MR. PHILLIPS:</p> <p>3 Q Do you have any information as to why Ms.</p> <p>4 Manigault Newman's payroll or payments were withheld</p> <p>5 until she signed the subject NDA?</p> <p>6 MR. STONEROCK: Objection, misstates testimony</p> <p>7 in this case, misstates the record, argumentative,</p> <p>8 calls for speculation, lacks foundation.</p> <p>9 You can answer, Sean, if you understand the</p> <p>10 question.</p> <p>11 THE WITNESS: I think everybody on the</p> <p>12 campaign, whether -- if they were submitting an</p> <p>13 invoice, they had to have a signed contract and an</p> <p>14 NDA prior to being paid.</p> <p>15 BY MR. PHILLIPS:</p> <p>16 Q Okay.</p> <p>17 A I do know in her circumstances, I believe she</p> <p>18 was sending her invoices directly to the HR director</p> <p>19 and on a personal email, and I believe that might have</p> <p>20 tied some of it up.</p> <p>21 The other side of it is the campaign won't pay</p> <p>22 an invoice without a W-9. I know there was some issues</p> <p>23 with that more recent, not so much in 2016.</p> <p>24 So there's a whole bunch of factors of why an</p> <p>25 invoice would be held up.</p>	<p style="text-align: right;">Page 215</p> <p>1 THE WITNESS: I would probably say over 250.</p> <p>2 BY MR. PHILLIPS:</p> <p>3 Q Okay. Do you know if President Trump is</p> <p>4 affiliated with more than 500 companies?</p> <p>5 MR. STONEROCK: Calls for speculation, lacks</p> <p>6 foundation.</p> <p>7 THE WITNESS: I do not.</p> <p>8 BY MR. PHILLIPS:</p> <p>9 Q Okay. Do you know what people in Donald</p> <p>10 Trump's family are covered by the subject nondisclosure</p> <p>11 agreement?</p> <p>12 MR. STONEROCK: Calls for a legal conclusion,</p> <p>13 calls for speculation.</p> <p>14 You can answer if you have an understanding,</p> <p>15 Sean.</p> <p>16 THE WITNESS: No, sir.</p> <p>17 BY MR. PHILLIPS:</p> <p>18 Q Have you had conversations with anyone, not</p> <p>19 counsel, at the campaign -- campaign about whether the</p> <p>20 NDA covers campaign workers that left and actually went</p> <p>21 to work for the federal government?</p> <p>22 MR. STONEROCK: Objection, calls for a legal</p> <p>23 conclusion, calls for attorney work product</p> <p>24 information, calls for attorney-client</p> <p>25 communications.</p>
<p style="text-align: right;">Page 214</p> <p>1 Q Have you had any conversations within anyone</p> <p>2 within the campaign that's not counsel regarding</p> <p>3 whether or not the subject employment agreements,</p> <p>4 nondisclosure and nondisparagement provisions, are</p> <p>5 enforceable or unenforceable under New York law?</p> <p>6 MR. STONEROCK: Objection, calls for work</p> <p>7 product -- attorney work product information, calls</p> <p>8 for attorney-client communications, calls for a</p> <p>9 legal conclusion.</p> <p>10 Sean, you can answer if you have had</p> <p>11 discussions with anyone other than counsel,</p> <p>12 including in-house counsel.</p> <p>13 THE WITNESS: No, sir.</p> <p>14 BY MR. PHILLIPS:</p> <p>15 Q Okay. Do you know how many people and</p> <p>16 entities are covered by the subject nondisclosure</p> <p>17 agreement?</p> <p>18 MR. STONEROCK: Calls for a legal conclusion.</p> <p>19 The document speaks for itself.</p> <p>20 Sean, you can answer if you know.</p> <p>21 THE WITNESS: I do not know the exact number,</p> <p>22 sir.</p> <p>23 BY MR. PHILLIPS:</p> <p>24 Q Okay. Do you know an approximate number?</p> <p>25 MR. STONEROCK: Same objections.</p>	<p style="text-align: right;">Page 216</p> <p>1 Sean, if you've discussed that with anybody,</p> <p>2 you know, other than counsel for the campaign,</p> <p>3 including in-house counsel, you can testify to</p> <p>4 that.</p> <p>5 THE WITNESS: No, sir.</p> <p>6 BY MR. PHILLIPS:</p> <p>7 Q Okay. Do you know -- personally, do you know</p> <p>8 anything about the relation -- the relationship Donald</p> <p>9 Trump had with Jeffrey Epstein?</p> <p>10 MR. STONEROCK: Objection, relevance,</p> <p>11 argumentative.</p> <p>12 You can answer, Sean, if you know.</p> <p>13 THE WITNESS: No, sir.</p> <p>14 MR. PHILLIPS: I forgot where I was.</p> <p>15 Probably, like, 26, 27, Beth. I have it. We can</p> <p>16 track it down.</p> <p>17 COURT REPORTER: I believe this is 26.</p> <p>18 MR. PHILLIPS: Okay. So Defendant's 26 will</p> <p>19 be a tweet dated August 31, 2019 from</p> <p>20 @realDonaldTrump.</p> <p>21 (Respondent's Exhibit 26 was identified and</p> <p>22 later marked for identification.)</p> <p>23 BY MR. PHILLIPS:</p> <p>24 Q Do you know who had access to post from</p> <p>25 @realDonaldTrump when it -- when he still had a Twitter</p>

<p style="text-align: right;">Page 217</p> <p>1 account?</p> <p>2 MR. STONEROCK: Objection, calls for</p> <p>3 speculation, lacks foundation.</p> <p>4 You can answer if you know.</p> <p>5 THE WITNESS: No, sir.</p> <p>6 BY MR. PHILLIPS:</p> <p>7 Q Okay. The -- the statement says, "Yes, I am</p> <p>8 currently suing various people for violating their</p> <p>9 confidentiality agreements."</p> <p>10 We're gonna stop there for purposes of my next</p> <p>11 question. Do you know who else Donald Trump sued for</p> <p>12 violating confidentiality agreements?</p> <p>13 MR. STONEROCK: Calls for speculation, lacks</p> <p>14 foundation, vague as to time, calls for attorney</p> <p>15 work product, calls for attorney-client</p> <p>16 communications.</p> <p>17 You can answer if it's based upon anything you</p> <p>18 learned from anything other than discussions with</p> <p>19 counsel or correspondence with counsel.</p> <p>20 THE WITNESS: No, sir.</p> <p>21 BY MR. PHILLIPS:</p> <p>22 Q Okay. Do you know who Louise Mensch is,</p> <p>23 M-e-n-s-c-h?</p> <p>24 A No, sir.</p> <p>25 Q Do you know who Dexter Taylor is?</p>	<p style="text-align: right;">Page 219</p> <p>1 MR. PHILLIPS: Ryan, I'm probably wrapping up</p> <p>2 in the next 20, 30 minutes, but let me take a break</p> <p>3 for 10 minutes, and hopefully we can be done</p> <p>4 and out of here by 4:00.</p> <p>5 MR. STONEROCK: Sounds good.</p> <p>6 MR. PHILLIPS: Okay.</p> <p>7 (Break from 3:08 p.m. to 3:18 p.m.)</p> <p>8 MR. PHILLIPS: Back on at 3:18.</p> <p>9 BY MR. PHILLIPS:</p> <p>10 Q Mr. Dollman, again, thank you for your</p> <p>11 patience. I know this isn't easy, particularly in this</p> <p>12 setting. I appreciate it. We're -- we're a few</p> <p>13 minutes away from being done, at least, with my</p> <p>14 questions. I assume that will wrap it up, but you</p> <p>15 never know.</p> <p>16 Have you had any conversations -- again, not</p> <p>17 related to conversations with lawyers for the</p> <p>18 campaign -- about the duration of the subject</p> <p>19 nondisclosure agreement, how long it lasts?</p> <p>20 MR. STONEROCK: Objection, calls for a legal</p> <p>21 conclusion, calls for attorney work product, calls</p> <p>22 for attorney-client communications.</p> <p>23 You can answer if you had any discussions with</p> <p>24 non-counsel, Sean.</p> <p>25 THE WITNESS: No, I have -- I have never spoke</p>
<p style="text-align: right;">Page 218</p> <p>1 A No, sir.</p> <p>2 Q Have you ever seen a tweet by Dexter Taylor</p> <p>3 that indicates Donald Trump lost his vote because of</p> <p>4 the way he was treated while interning at the</p> <p>5 Whitehouse?</p> <p>6 A Besides the one you're showing me right now?</p> <p>7 Q Right. That's a no?</p> <p>8 A Yes, sir. No, I've never -- never seen it</p> <p>9 before.</p> <p>10 Q So for all the people who -- who we saw in</p> <p>11 commercials of people who -- who said they -- they</p> <p>12 voted for Trump -- strike that. Let me stop for a</p> <p>13 second.</p> <p>14 Have you done any investigation personally</p> <p>15 about whether there is a tape in which Donald Trump</p> <p>16 uses the N-word? Do you know -- well, first of all, do</p> <p>17 you know what I mean by the N-word?</p> <p>18 A Yes, sir.</p> <p>19 Q Okay. Have you done any personal</p> <p>20 investigation to determine if there's any recording of</p> <p>21 Donald Trump using the N-word?</p> <p>22 A No, sir.</p> <p>23 Q Do you know whether or not that exists</p> <p>24 definitively?</p> <p>25 A No, sir.</p>	<p style="text-align: right;">Page 220</p> <p>1 with anybody else about the NDA.</p> <p>2 BY MR. PHILLIPS:</p> <p>3 Q Okay. Do you have an opinion about how long</p> <p>4 it lasts?</p> <p>5 MR. STONEROCK: Calls for a legal conclusion.</p> <p>6 THE WITNESS: Yeah, I would -- I would think</p> <p>7 it goes on forever.</p> <p>8 BY MR. PHILLIPS:</p> <p>9 Q Okay. Does it go on retroactively? Does it</p> <p>10 cover statements made before you signed the NDA, in --</p> <p>11 in your opinion?</p> <p>12 MR. STONEROCK: Objection, calls for a legal</p> <p>13 conclusion, incomplete hypothetical.</p> <p>14 You can answer it if you have an opinion,</p> <p>15 Sean.</p> <p>16 THE WITNESS: Yeah, I'm not a lawyer. I -- I</p> <p>17 am unsure on that one.</p> <p>18 BY MR. PHILLIPS:</p> <p>19 Q Okay. A few more questions. Prior to the</p> <p>20 election in November of 2020, Treasury Secretary Steve</p> <p>21 Mnuchin referred to Donald Trump as an idiot. Did that</p> <p>22 damage the campaign?</p> <p>23 MR. STONEROCK: Objection, vague as to time,</p> <p>24 calls for a legal conclusion, calls for expert</p> <p>25 witness testimony, incomplete hypothetical.</p>

<p style="text-align: right;">Page 221</p> <p>1 You can answer if you know, Sean.</p> <p>2 THE WITNESS: I was -- I was unaware of that</p> <p>3 comment.</p> <p>4 BY MR. PHILLIPS:</p> <p>5 Q Okay. Former Secretary of State Rex Tillerson</p> <p>6 is attributed to calling Donald Trump a moron. Are you</p> <p>7 aware of that comment?</p> <p>8 MR. STONEROCK: Same objections.</p> <p>9 THE WITNESS: No, sir.</p> <p>10 BY MR. PHILLIPS:</p> <p>11 Q Would the secretary of state calling the</p> <p>12 President of the United States a moron damage his</p> <p>13 chances of reelection?</p> <p>14 MR. STONEROCK: Calls for speculation, lacks</p> <p>15 foundation, incomplete hypothetical, calls for</p> <p>16 expert testimony.</p> <p>17 You can answer, Sean, if you know.</p> <p>18 THE WITNESS: I do not know.</p> <p>19 BY MR. PHILLIPS:</p> <p>20 Q Former top economic adviser Gary Cohn,</p> <p>21 C-o-h-n, was publicly attributed as saying Donald Trump</p> <p>22 was dumb as shit. Were you aware of that comment?</p> <p>23 MR. STONEROCK: Same objections.</p> <p>24 THE WITNESS: No, sir, I was not aware of that</p> <p>25 comment.</p>	<p style="text-align: right;">Page 223</p> <p>1 that -- that John Kelly is attributed as saying that</p> <p>2 we've got to save him from himself?</p> <p>3 A No, sir.</p> <p>4 Q Would comments from the president's chief of</p> <p>5 staff saying we've got to save him from himself affect</p> <p>6 his chances of reelection?</p> <p>7 MR. STONEROCK: Incomplete hypothetical, calls</p> <p>8 for speculation, lacks foundation, calls for a</p> <p>9 legal conclusion, calls for expert testimony.</p> <p>10 You can answer, Sean, if you know.</p> <p>11 THE WITNESS: I do not know.</p> <p>12 BY MR. PHILLIPS:</p> <p>13 Q Do you know how many members of the -- I guess</p> <p>14 how many leaders -- strike that.</p> <p>15 Do you know how many management-level</p> <p>16 positions within the Trump campaign -- strike that.</p> <p>17 It's getting long -- it's getting late.</p> <p>18 Who from Donald J. Trump for President, Inc.</p> <p>19 was indicted, if anybody?</p> <p>20 MR. STONEROCK: Objection, vague as to time,</p> <p>21 relevance.</p> <p>22 You can answer if you know.</p> <p>23 THE WITNESS: I don't have that information.</p> <p>24 BY MR. PHILLIPS:</p> <p>25 Q Okay. Were you aware if Paul Manafort was</p>
<p style="text-align: right;">Page 222</p> <p>1 BY MR. PHILLIPS:</p> <p>2 Q Would an economic adviser calling the</p> <p>3 president he was working under dumb as shit damage a</p> <p>4 chance for reelection?</p> <p>5 MR. STONEROCK: Same objections.</p> <p>6 THE WITNESS: Yeah, I don't have an opinion on</p> <p>7 that, John.</p> <p>8 BY MR. PHILLIPS:</p> <p>9 Q Okay. National security adviser H. R.</p> <p>10 McMaster mocked Donald Trump's intelligence by calling</p> <p>11 him an idiot and a dope, with the intelligence of a</p> <p>12 kindergartner. Were you aware of those comments?</p> <p>13 A No, sir.</p> <p>14 Q Would comments such as that from a national</p> <p>15 security adviser under a president affect a president's</p> <p>16 chance of being reelected?</p> <p>17 MR. STONEROCK: Calls for a legal conclusion,</p> <p>18 calls for speculation, lacks foundation, incomplete</p> <p>19 hypothetical, calls for expert testimony.</p> <p>20 You can answer if you know, Sean.</p> <p>21 THE WITNESS: I do not know, sir.</p> <p>22 BY MR. PHILLIPS:</p> <p>23 Q Former Whitehouse chief of staff John Kelly</p> <p>24 said -- is attributed as saying we've got to save</p> <p>25 Donald Trump from himself. Were you aware of a comment</p>	<p style="text-align: right;">Page 224</p> <p>1 indicted?</p> <p>2 A Oh. Yes, sir.</p> <p>3 Q What effect would the indictment of a campaign</p> <p>4 manager or an executive within a campaign have on</p> <p>5 public confidence related to the reelection of that</p> <p>6 president?</p> <p>7 MR. STONEROCK: Objection, incomplete</p> <p>8 hypothetical, vague as to public confidence, calls</p> <p>9 for an expert opinion, calls for a legal</p> <p>10 conclusion, calls for speculation, lacks</p> <p>11 foundation.</p> <p>12 You can answer if you know, Sean.</p> <p>13 THE WITNESS: I do not know, sir.</p> <p>14 BY MR. PHILLIPS:</p> <p>15 Q Okay. Is there any way to attribute --</p> <p>16 and this is the same but different. Is there any way</p> <p>17 to attribute damages to Omarosa Manigault Newman</p> <p>18 and not top executives within the campaign and top</p> <p>19 cabinet-level officials either getting arrested,</p> <p>20 indicted, or calling Mr. Trump a moron or an idiot, is</p> <p>21 there any way to differentiate which one caused the</p> <p>22 campaign damages?</p> <p>23 MR. STONEROCK: Objection, compound, calls for</p> <p>24 a legal conclusion, calls for expert testimony.</p> <p>25 Sean, you can answer if you have an</p>

<p style="text-align: right;">Page 225</p> <p>1 understanding.</p> <p>2 THE WITNESS: I believe the comments -- I</p> <p>3 mean, just to have the difference in comments. One</p> <p>4 is claiming racism and sexist -- right -- and the</p> <p>5 other ones are to his intelligence.</p> <p>6 So if we were able to we could probably pull,</p> <p>7 like we did, the information or, like, the ads that</p> <p>8 we actually spent money on that were attributed to</p> <p>9 trying to correct the narrative that Omarosa</p> <p>10 publicly said about the president.</p> <p>11 And, I mean, we spent, like 17, 18 million on</p> <p>12 just ads that were kind of -- or that were with</p> <p>13 that narrative -- right -- trying to correct that</p> <p>14 narrative.</p> <p>15 BY MR. PHILLIPS:</p> <p>16 Q Right. And -- and -- and I think we've</p> <p>17 discussed this rather at length and candidly that it is</p> <p>18 the campaign's contention that Omarosa said -- or</p> <p>19 characterized Donald Trump as a racist and a sexist,</p> <p>20 but so did news media and so did many others. And I'm</p> <p>21 -- I'm -- I'm back to the question, based upon your</p> <p>22 answer, that is there any way to differentiate which</p> <p>23 caused the campaign damages?</p> <p>24 MR. STONEROCK: Calls for a legal conclusion,</p> <p>25 calls for expert testimony.</p>	<p style="text-align: right;">Page 227</p> <p>1 I'm -- I'm -- I'm trying to figure out where -- where</p> <p>2 that First Amendment lies. And we're not allowed to</p> <p>3 infringe on -- on people's opinions, but -- strike</p> <p>4 that.</p> <p>5 We get it. I don't want to go all the way</p> <p>6 down that road again and have Ryan have to assert six</p> <p>7 more objections. Let's see if I can wrap it up.</p> <p>8 MR. STONEROCK: Thank you, John. I appreciate</p> <p>9 that.</p> <p>10 MR. PHILLIPS: That darned old First</p> <p>11 Amendment.</p> <p>12 Mr. Dollman, Mr. Stonerock, I'm done. Thank</p> <p>13 you for your time.</p> <p>14 THE WITNESS: Thank you, sir.</p> <p>15 MR. STONEROCK: Thank you, John. Good</p> <p>16 afternoon, good night.</p> <p>17 MR. PHILLIPS: All right. Talk to you soon.</p> <p>18 MR. STONEROCK: Okay. Bye.</p> <p>19 MS. MANIGAULT NEWMAN: Thanks, John. Bye-bye.</p> <p>20 Good job.</p> <p>21 COURT REPORTER: Any instructions for the</p> <p>22 court reporter?</p> <p>23 MR. PHILLIPS: Does the witness read or waive,</p> <p>24 Ryan?</p> <p>25 MR. STONEROCK: See, I mean, we're operating</p>
<p style="text-align: right;">Page 226</p> <p>1 You can answer if you have an understanding,</p> <p>2 Sean.</p> <p>3 THE WITNESS: I -- I understand the question.</p> <p>4 I'm -- again, I'm not the expert in it, and I would</p> <p>5 probably go off of the expert's opinion and what he</p> <p>6 wrote up, he or she.</p> <p>7 BY MR. PHILLIPS:</p> <p>8 Q And let me finish here. You know, all the</p> <p>9 stuff we've discussed, all the clips we've played,</p> <p>10 isn't it -- NDA aside, but isn't it fair to have an</p> <p>11 opinion that Donald Trump is sexist?</p> <p>12 MR. STONEROCK: Objection, vague as -- as to</p> <p>13 the term "fair," calls for a legal conclusion,</p> <p>14 calls for speculation, lacks foundation, incomplete</p> <p>15 hypothetical.</p> <p>16 You can answer, Sean, if you understand.</p> <p>17 THE WITNESS: I think it's one thing to have</p> <p>18 an opinion, and it's another thing to go out</p> <p>19 and write a book and publicly speak negative about</p> <p>20 someone's family and private issues.</p> <p>21 BY MR. PHILLIPS:</p> <p>22 Q Understood.</p> <p>23 Absent -- assuming the NDA doesn't exist,</p> <p>24 wouldn't that -- and, again, I don't -- I know it's</p> <p>25 coming, I'm not a lawyer. But I guess, you know,</p>	<p style="text-align: right;">Page 228</p> <p>1 under sort of different, you know, rules. I'm not</p> <p>2 sure exactly what the New York rules are. But I</p> <p>3 would like to have Sean have an opportunity to</p> <p>4 review the transcript and correct any- -- anything</p> <p>5 that, you know, he needs to correct, so . . .</p> <p>6 MR. PHILLIPS: That's totally appropriate</p> <p>7 and fine.</p> <p>8 And I'll let you know if we're ordering a</p> <p>9 copy, unless the campaign wants to pay for it.</p> <p>10 MR. STONEROCK: Yeah. I mean, we're going to</p> <p>11 -- we're going to order a copy.</p> <p>12 MR. PHILLIPS: Okay.</p> <p>13 MR. STONEROCK: So I know we went through</p> <p>14 this -- we went back and forth on this the last</p> <p>15 time. But I understand that Mrs. Masters would</p> <p>16 like each party, if they're gonna get a copy, to</p> <p>17 pay for it. So we're not gonna pay for -- for your</p> <p>18 client's copy, John. We'll pay for our own.</p> <p>19 MR. PHILLIPS: Okay. No. That's fine. I'll</p> <p>20 take a copy. But if you're ordering it, that --</p> <p>21 that saves me, like, a little bit of money.</p> <p>22 COURT REPORTER: Okay. So we have to conclude</p> <p>23 definitely who is ordering the original.</p> <p>24 MR. STONEROCK: Well, the original, John,</p> <p>25 should go to you.</p>

Page 229	Page 231																																																																																				
<p>1 MR. PHILLIPS: Okay. I'll take it.</p> <p>2 MR. STONEROCK: I mean, and we should get --</p> <p>3 MR. PHILLIPS: I was trying to save some money</p> <p>4 for my client, you know.</p> <p>5 COURT REPORTER: All right, John, so you're</p> <p>6 ordering the original?</p> <p>7 MR. PHILLIPS: I am.</p> <p>8 COURT REPORTER: And Ryan will take a copy.</p> <p>9 Thank you.</p> <p>10 (Discussion off the record.)</p> <p>11 (The deposition was concluded at 3:30 p.m.)</p> <p>12 - - -</p>	<p>1 C E R T I F I C A T E</p> <p>2 STATE OF FLORIDA)</p> <p>3 COUNTY OF DUVAL)</p> <p>4 I, ELIZABETH M. MASTERS, RPR, Notary Public,</p> <p>5 State of Florida at Large, certify that I was authorized to</p> <p>6 and did remotely stenographically report the video-recorded</p> <p>7 deposition of SEAN RAY DOLLMAN; that a review of the</p> <p>8 transcript was requested; and that the transcript is a true</p> <p>9 and complete record of my stenographic notes.</p> <p>10 I further certify that I am not a relative,</p> <p>11 employee, attorney or counsel of any of the parties, nor am</p> <p>12 I a relative or employee of any of the parties' attorney or</p> <p>13 counsel connected with the action, nor am I financially</p> <p>14 interested in the action.</p> <p>15 Dated this 16th day of April 2021.</p> <p>16</p> <p>17</p> <p>18</p> <p>19 /s/ Elizabeth M. Masters</p> <p>20 ELIZABETH M. MASTERS, RPR</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>																																																																																				
<p>1 C E R T I F I C A T E O F O A T H</p> <p>2 STATE OF FLORIDA)</p> <p>3 COUNTY OF DUVAL)</p> <p>4</p> <p>5 I, ELIZABETH M. MASTERS, hereby certify that the</p> <p>6 witness named herein appeared remotely before me on March</p> <p>7 31, 2021, produced a Arizona Driver's License as</p> <p>8 identification, and was duly sworn.</p> <p>9 DATED this 16th day of April 2021.</p> <p>10</p> <p>11</p> <p>12 /s/ Elizabeth M. Masters</p> <p>13 ELIZABETH M. Masters, RPR</p> <p>14 Notary Public - State of Florida</p> <p>15 My Commission No. GG 987462</p> <p>16 Expires: June 4, 2024</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p>1 E R R A T A S H E E T</p> <p>2 DO NOT WRITE ON TRANSCRIPT - ENTER CHANGES BELOW</p> <p>3 IN RE: DONALD J. TRUMP FOR PRESIDENT, INC. v. OMAROSA</p> <p>4 MANIGAULT NEWMAN</p> <table border="1"> <thead> <tr> <th>5 PAGE</th> <th>6 LINE</th> <th>7 CHANGE</th> <th>8 REASON</th> </tr> </thead> <tbody> <tr><td>6</td><td></td><td></td><td></td></tr> <tr><td>7</td><td></td><td></td><td></td></tr> <tr><td>8</td><td></td><td></td><td></td></tr> <tr><td>9</td><td></td><td></td><td></td></tr> <tr><td>10</td><td></td><td></td><td></td></tr> <tr><td>11</td><td></td><td></td><td></td></tr> <tr><td>12</td><td></td><td></td><td></td></tr> <tr><td>13</td><td></td><td></td><td></td></tr> <tr><td>14</td><td></td><td></td><td></td></tr> <tr><td>15</td><td></td><td></td><td></td></tr> <tr><td>16</td><td></td><td></td><td></td></tr> <tr><td>17</td><td></td><td></td><td></td></tr> <tr><td>18</td><td></td><td></td><td></td></tr> <tr><td>19</td><td></td><td></td><td></td></tr> <tr><td>20</td><td></td><td></td><td></td></tr> <tr> <td>21</td> <td colspan="3">"Under penalties of perjury, I declare that I</td> </tr> <tr> <td>22</td> <td colspan="3">have read the foregoing document and that the facts stated</td> </tr> <tr> <td>23</td> <td colspan="3">in it are true."</td> </tr> <tr> <td>24</td> <td>DATE</td> <td colspan="2">SEAN RAY DOLLMAN</td> </tr> <tr> <td>25</td> <td></td> <td colspan="2"></td> </tr> </tbody> </table>	5 PAGE	6 LINE	7 CHANGE	8 REASON	6				7				8				9				10				11				12				13				14				15				16				17				18				19				20				21	"Under penalties of perjury, I declare that I			22	have read the foregoing document and that the facts stated			23	in it are true."			24	DATE	SEAN RAY DOLLMAN		25			
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15 RE: DONALD J. TRUMP FOR PRESIDENT v. OMAROSA MANIGAULT
16 NEWMAN
17 Deposition of: Sean Ray Dollman
18
19 Dear Mr. Stonerock:
20
21 This letter is to notify you that the transcript of Mr.
22 Dollman's deposition that was taken on March 31, 2021 is
23 now ready for his review.
24
25 Please have Mr. Dollman read your copy of his deposition
transcript that was emailed to you. Upon execution of the
attached Errata Sheet, if you would please provide a copy
to Mr. Phillips.
Thank you for your assistance.
Sincerely,
/s/ Elizabeth M. Masters
Elizabeth M. Masters, RPR
cc: John M. Phillips, Esquire
jmp@floridajustice.com

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Riley Reporting & Associates, Inc.

Exhibit F

In the Matter of the Arbitration between

Donald J. Trump for President, Inc.,

AAA Case Number 01-17-0004-4706

Claimant,

Before: Stephen F. Ruffino

and

Arlene Delgado,

Respondent.

AWARD OF ARBITRATOR

I, THE UNDERSIGNED ARBITRATOR, having been designated in accordance with the arbitration agreement entered into by the parties as part of an Agreement (undated, but represented by Claimant to have been entered into September 2016 and seemingly concurred in by Respondent), and having been duly sworn, and having fully reviewed and considered the documents, authorities and oral arguments submitted to me by both parties, hereby AWARD as follows:

1. Per the procedure agreed upon and ordered April 14, 2020, Claimant made a dispositive motion and Respondent filed a dispositive cross-motion, both of which are before me at this time. Because the parties agree there are no material factual issues in dispute, the case may be disposed of by summary judgment, and because I believe that relief is appropriate on the record in this case, I find in favor of Respondent and dismiss all claims in this arbitration.
2. Both parties provided extensive recitations of events that occurred among certain participants who acted for Donald J. Trump for President, Inc. during the 2016 presidential campaign. Essentially, those facts are not in dispute. However, for purposes of this decision and Award, most of the factual events are largely immaterial because the claims can be addressed and decided on (1) the text of the Agreement and (2) the texts of the statements admittedly made by Respondent. Accordingly, I will not recite or address those events that I believe are not material. (Similarly, I need not reach alternate legal arguments made by each party and will not do so.)
3. The Agreement is a set of restrictive covenants that apply to Respondent's conduct. These include confidentiality (non-disclosure), non-disparagement, non-compete and intellectual property provisions. Claimant alleges Respondent breached the confidentiality and non-disparagement provisions. (Respondent previously withdrew her counterclaims.)
4. Paragraph 1 of the Agreement sets forth the non-disclosure provisions, which prohibit Respondent from disclosing "Confidential Information" as defined in its paragraph 6. That definition states, in pertinent part, that Confidential Information includes "all information of a private ... nature or that Mr. Trump insists remain private or confidential, including ... any information with respect to ... the political affairs of Mr. Trump"
5. Per the definition of Confidential Information, as applied to the facts herein, there can only be a prohibited disclosure if Respondent published private information regarding Mr. Trump's political affairs. Any attempt to read that text so as to prohibit the disclosure of all private information, even Respondent's own, without the qualifying reference to Mr. Trump's

political affairs, would result in an overly broad, vague and unenforceable restriction. (Similarly, the portion of the definition that seeks to include any information "that Mr. Trump insists remain private or confidential" is overly broad and vague, and so is unenforceable, especially in the context of a restrictive covenant.)

6. Respondent is accused of, and admits to, publishing six tweets on December 22 and 24, 2016, that contained opinions (as distinct from confidential facts) and/or information regarding her personal life. Those tweets were strictly personal in nature and did not violate the prohibition on disclosing information regarding Mr. Trump's political affairs. Regardless of their alleged public impact, the essential nature of those communications does not fall within the enforceable definition of Confidential Information in the Agreement.

7. Paragraph 2 of the Agreement prohibits Respondent from disparaging Claimant. It is questionable whether the tweets were disparaging, but even if they were, I agree with Respondent's argument that her comments were directed only at an individual colleague, not Claimant.

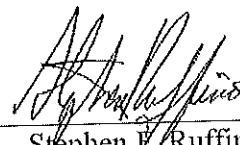
8. Per paragraph 8.c of the Agreement, an award of reasonable legal fees and costs to the prevailing party, Respondent, is mandatory. Respondent has submitted an application for attorneys' fees, supported by time records. Respondent did not ask for an award of her costs. I find that the hourly rates, the work performed and the total hours expended are reasonable (and comparable to those requested by Claimant in its application.) Accordingly, I award forty eight thousand seven hundred fifty dollars (\$48,750.00) to Respondent, to be paid by Claimant.

9. The administrative fees of the American Arbitration Association, totaling seven thousand five hundred dollars (\$7,500.00), and the compensation of the arbitrator, totaling two thousand three hundred forty-five dollars (\$2,345.00), shall be borne by Claimant. Therefore, Claimant shall reimburse Respondent the sum of one thousand one hundred seventy-two dollars and fifty cents (\$1,172.50), representing that portion of said fees previously incurred and paid by Respondent.

10. The above amounts referenced in paragraphs 8 and 9 are to be paid on or before 30 days from the date of this Award, and shall accrue interest thereafter at the applicable statutory rate until paid.

This Award is in full settlement of all claims submitted to this Arbitration. All claims not expressly granted herein are hereby denied.

October 8, 2020


Stephen F. Ruffino

I, Stephen F. Ruffino, do hereby affirm upon my oath as Arbitrator that I am the individual described in and who executed this instrument, which is my Award.

October 8, 2020

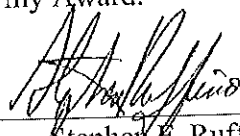

Stephen F. Ruffino

Exhibit G

CONSULTING AGREEMENT

This confirms the agreement between Donald J. Trump for President (“we” or “us” or “our”) and AJ Delgado (“you” or “your”), effective September 1, 2016. We have agreed as follows:

1. Engagement. You have agreed to perform the services described on Exhibit A (the “Services”) during the period of your engagement.
2. Compensation and Reimbursement. During your engagement, you shall be compensated for your services at a rate of \$10,000 per month. You must provide us a monthly invoice for services for payment according to our standard policies. As an independent contractor, you are responsible for overhead costs incurred in the regular course of business as an independent contractor. You will be reimbursed only for pre-approved, reasonable expenses actually incurred by you and necessary for you to provide Services. To be reimbursed, expenses must be pre-approved and submitted according to our standard reimbursement policies including providing original receipts or other acceptable documentation of expense. Any travel shall be reimbursed only at a coach or other discount rate.
3. Term. Our agreement shall continue through November 10, 2016 unless either party terminates the agreement earlier by giving ten (10) days written notice to the other party. In addition, we may end your engagement early and terminate this agreement immediately upon written notice, if you fail to, or are unable to, perform the Services properly, are dishonest or are arrested, or if Donald J. Trump (“DJT”) announces that he will not continue to run for the presidency of the United States of America (the “Presidency”), or if you breach the agreement with us relating to confidentiality, non-disparagement, non-competition, non-solicitation and protection of intellectual property that you are executing simultaneously with this agreement (the “Companion Agreement”) as a condition to our consent to enter into this agreement.
4. Non-coordination. You represent and agree that you are generally familiar with the federal laws and regulations governing improper “coordination” of political and issue communications and will abide by such laws and regulations, including, but not limited to, implementing any safeguards necessary for common vendors, if applicable.
5. Conflicts. You agree to disclose to us any actual or potential conflicts of interest.
6. Public Communications. In addition to your duties in the Companion Agreement, you agree not to communicate, directly or indirectly, with any member of the news media on behalf of, for, or about us or DJT without express authorization from the campaign manager or her designee. You agree not to disseminate any communications to the public about us or DJT—in whatever form they may be, whether written, electronic, or otherwise—without express authorization to do so from the campaign manager or her designee.
7. Compliance. You will comply with all federal, state, and local statutes, regulations, ordinances, and rules, as well as any of our policies and procedures relating, directly or indirectly, to your performance of Services. Without limiting the generality of the foregoing, you agree to comply with all laws pertaining to campaign finance and government ethics.

8. Independent Contractor. You are an independent contractor, not our employee, and not entitled to any health or other employee benefits from us, and we will not pay or withhold payroll or other federal, state, and/or local taxes, payroll taxes, unemployment insurance, worker's compensation or other similar personnel costs for you. As an independent contractor, you are not an agent of us and may not enter into any legally binding agreement, written or oral, or take any other legal act in our name without express permission to do so.

9. Disputes. This agreement will be governed by the law of New York State. Any disputes relating to this agreement may be resolved only in a federal or state court sitting in New York State and you hereby submit to the jurisdiction of such courts and IRREVOCABLY WAIVE YOUR RIGHT TO TRIAL BY JURY (i.e. you agree that a judge and not a jury will hear and decide the case).

10. Indemnification. You agree to indemnify, defend, and hold us harmless from any loss, liability, costs or damages arising from the negligence, gross negligence, intentional misconduct, or breach of this Agreement by you.

11. Modification. This agreement may only be changed by a writing signed by both you and us.

12. Assignment; Successor Organizations. You agree that, in the event we roll over operations into any successor organization, this Agreement shall be automatically assigned and be binding on and inure to the benefit of such successor organization and you for the duration of the term. This agreement is not otherwise assignable.


Donald J. Trump For President By: _____ Name: Title: Notice Address: 725 Fifth Avenue New York, New York 10022	AJ Delgado By:  Name: AJ Delgado SSN: 589704056 Notice Address: 1825 Ponce de Leon #79 Coral Gables, FL 33134
---	--

Exhibit A

Consulting Services

- Provide policy advice regarding various matters;
- Coordinate Spanish-language media efforts;
- Appear as a surrogate in the media;
- Advise regarding Hispanic outreach and assist with same; and
- Fully comply with, and discharge all campaign related obligations under any applicable laws, regulations, rules, decrees or executive or judicial orders now or hereafter in force relating to such activities.

Note: You must direct what will be done and how it will be done. We will only direct the desired result.

Exhibit H

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AGREEMENT

You have requested that the entity signing below (the "Company") engage you (as an employee or an independent contractor, as applicable) to perform services, or an independent contractor that employs you has requested to be engaged by Company to perform services and you desire in your capacity as an employee of such independent contractor to perform all or a part of such services. You have made the promises and agreements set forth below in order to induce the Company to accept your or your employer's, as applicable, offer of engagement and to permit you, in the applicable capacity, to perform all or a portion of the subject services. Those promises and agreements are part of what the Company is receiving in exchange for agreeing to engage you or your employer, and to permit you to perform all or a portion of the subject services, and the Company is relying on your fulfillment of these promises and agreements.

Any Initially capitalized terms that are not defined when used in this agreement are defined in paragraph 6 below.

1. No Disclosure of Confidential Information. During the term of your service and at all times thereafter you hereby promise and agree:

a. not to disclose, disseminate or publish, or cause to be disclosed, disseminated or published, any Confidential Information;

b. not to assist others in obtaining, disclosing, disseminating, or publishing Confidential Information;

c. not to use any Confidential Information in any way detrimental to the Company, Mr. Trump, any Family Member, any Trump Company or any Family Member Company;

d. not to save, store or memorialize any Confidential Information (including, without limitation, incorporating it into any storage device, server, Internet site or retrieval system, whether electronic, cloud based, mechanical or otherwise) except as may be expressly required in connection with the performance of services to the Company;

e. to (i) provide the Company with written notice of any legal obligation to disclose any Confidential Information as soon as you become aware of such obligation, (ii) not make any disclosure notwithstanding such obligation until the Company (or the appropriate Trump Person) has had a reasonable opportunity to seek an appropriate protective order or similar relief, (iii) fully cooperate and join with the Company (and the appropriate Trump Person) in any request for a protective order or similar relief, (iv) exercise all reasonable efforts to obtain reliable assurance that confidential treatment will be accorded such Confidential Information in the event no such protective order or similar relief is obtained, whether because it has been denied or because the Company (or the appropriate Trump Person) has elected not to seek it, and (iv) under all circumstances, not furnish any greater portion of the Confidential Information than you are advised by counsel is absolutely legally required to be disclosed by you or furnish any Confidential Information to any individual, company or governmental entity other than the one to whom or to which you are absolutely legally required to disclose it; and

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f. promptly upon the request, whenever made, of the Company, (i) return to the Company all Confidential Information furnished to you, together with all copies, abstracts, notes, reports, or other materials furnished to, or otherwise obtained by, you or prepared by you or on your behalf, without retaining copies, extracts or other reproductions, whether physical, electronic, cloud based or otherwise, in whole or in part, (ii) destroy all documents, memoranda, notes or other writings prepared by you or anyone on your behalf that are based upon the Confidential Information, and (iii) acknowledge such destruction in writing to Company.

The foregoing provisions each apply to Confidential Information and disclosure, dissemination, publication, use and effort to help others obtain, saving, storing and memorializing of Confidential Information, as applicable, (i) by any means of expression, including but not limited to verbal, written, or visual, (ii) whether or not preserved in any medium now known or hereafter discovered or invented, including but not limited to audio recording of any type, written text, drawing, photograph, film, video, or electronic device, (iii) in any manner or form, including but not limited to any book, article, memoir, diary, letter, essay, speech, interview, panel or roundtable discussion, image, drawing, cartoon, radio broadcast, television broadcast, video, movie, theatrical production, Internet website, e-mail, Twitter tweet, Facebook page, or otherwise, even if fictionalized, (iv) in any language, or (v) in any country or other jurisdiction (collectively, the "Restricted Means and Contexts").

2. No Disparagement. During the term of your service and at all times thereafter you hereby promise and agree not to demean or disparage publicly the Company, Mr. Trump, any Trump Company, any Family Member, or any Family Member Company or any asset any of the foregoing own, or product or service any of the foregoing offer, in each case by or in any of the Restricted Means and Contexts and to prevent your employees from doing so.

3. No Competitive Services. Until the Non-Compete Cutoff Date you promise and agree not to assist or counsel, directly or indirectly, for compensation or as a volunteer, any person that is a candidate or exploring candidacy for President of the United States other than Mr. Trump and to prevent your employees from doing so.

4. No Competitive Solicitation. Until the Non-Solicitation Cutoff Date you promise and agree not to hire or solicit for hiring, or assist any other person, entity or organization to hire or solicit for hiring, any person that is an independent contractor of, employee of an independent contractor of, or employee of Company or any other Trump Person and who at any time provides services for the project or objective for which you or your employer, as applicable, are being engaged.

5. No Competitive Intellectual Property Claims. During the term of your service and at all times thereafter you promise and agree never to assert any rights to any intellectual property that (a) includes the name "Trump," (b) is owned by or associated with the Company, Mr. Trump, any Trump Company, any Family Member or any Family Member Company, for example, without limitation, any name, likeness, voice, or image of Mr. Trump or any Family Member, or any logo, motto or phrase created, developed or commonly associated with any of them, or (c) is developed in connection with the project or objective for which your services are

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being engaged (all of which will be deemed a "work made for hire" or will be assigned by you to us).

6. **Definitions.** As used in this agreement, the following definitions apply:

a. **"Confidential Information"** means all information (whether or not embodied in any media) of a private, proprietary or confidential nature or that Mr. Trump insists remain private or confidential, including, but not limited to, any information with respect to the personal life, political affairs, and/or business affairs of Mr. Trump or of any Family Member, including but not limited to, the assets, investments, revenue, expenses, taxes, financial statements, actual or prospective business ventures, contracts, alliances, affiliations, relationships, affiliated entities, bids, letters of intent, term sheets, decisions, strategies, techniques, methods, projections, forecasts, customers, clients, contacts, customer lists, contact lists, schedules, appointments, meetings, conversations, notes, and other communications of Mr. Trump, any Family Member, any Trump Company or any Family Member Company.

b. **"Family Member"** means any member of Mr. Trump's family, including, but not limited to, Mr. Trump's spouse, each of Mr. Trump's children and grandchildren and their respective spouses, including but not limited to Donald J. Trump Jr., Eric F. Trump and Ivanka M. Trump, Tiffany Trump, and Barron Trump, and their respective spouses, children and grandchildren, if any, and Mr. Trump's siblings and their respective spouses and children, if any.

c. **"Family Member Company"** means any entity, partnership, trust or organization that, in whole or in part, was created by or for the benefit of any Family Member or is controlled or owned by any Family Member.

d. **"Non-Compete Cut Off Date"** means the date the current U.S. presidential election cycle is over or, if earlier, the date Mr. Trump announces that he will not run or will no longer run for the Presidency of the United States of America in the current U.S. presidential election cycle.

e. **"Non-Solicitation Cutoff Date"** means the Non-Compete Cut Off Date.

f. **"Trump Company"** means any entity, partnership, trust or organization that, in whole or in part, was created by or for the benefit of Mr. Trump or is controlled or owned by Mr. Trump.

g. **"Trump Person"** means each of Mr. Trump, each Family Member, each Trump Company (including but not limited to the Company) and each Family Member Company.

7. **Remedies for Breach of this Agreement.**

a. **Consent to Injunction.** A breach of any of your promises or agreements under this agreement will cause the Company, Mr. Trump and each other Trump Person irreparable harm. Accordingly, to the extent permitted by law, and without waiving any other rights or remedies against you at law or in equity, you hereby consent to the entry of any order, without prior notice

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to you, temporarily or permanently enjoining you from violating any of the terms, covenants, agreements or provisions of this agreement on your part to be performed or observed. Such consent is intended to apply to an injunction of any breach or threatened breach.

b. Agreement to Indemnify. You hereby agree to indemnify, defend (with counsel acceptable to the Trump Person you are defending) and hold harmless each Trump Person from and against any claim, demand, suit, proceeding, damages, cost, loss or expense of any kind or nature, including but not limited to reasonable attorneys' fees and disbursements, incurred by any Trump Person as a consequence of your breach of any of your promises or agreements in this agreement.

c. Damages and Other Remedies. Notwithstanding anything to the contrary, each Trump Person will be entitled to all remedies available at law and equity, including but not limited to monetary damages, in the event of your breach of this agreement. Nothing contained in this agreement will constitute a waiver of any Trump Person's remedies at law or in equity, all of which are expressly reserved.

d. Third Party Beneficiaries. Mr. Trump and each Family Member, Trump Company and Family Member Company is an intended third party beneficiary of this agreement. Without limiting the preceding sentence, Mr. Trump, each Family Member, Trump Company and Family Member Company, in addition to the Company, will be entitled to the benefit of this agreement and to enforce this agreement.

8. Resolution of Disputes.

a. Governing Law; Jurisdiction and Venue. This Agreement is deemed to have been made in the State of New York, and any and all performance hereunder, breach hereof, or claims with respect to the enforceability of this agreement must be interpreted and construed pursuant to the laws of the State of New York without regard to conflict of laws or rules applied in the State of New York. You hereby consent to exclusive personal jurisdiction and venue in the State of New York with respect to any action or proceeding brought with respect to this agreement.

b. Arbitration. Without limiting the Company's or any other Trump Person's right to commence a lawsuit in a court of competent jurisdiction in the State of New York, any dispute arising under or relating to this agreement may, at the sole discretion of each Trump Person, be submitted to binding arbitration in the State of New York pursuant to the rules for commercial arbitrations of the American Arbitration Association, and you hereby agree to and will not contest such submissions. Judgment upon the award rendered by an arbitrator may be entered in any court having jurisdiction.

c. Prevailing Party Fees. Any court judgment or arbitration award shall include an award of reasonable legal fees and costs to the prevailing party.

d. Interpretation and Representation by Counsel. This agreement has been drafted on behalf of the undersigned only as a convenience and may not, by reason of such action, be construed against the undersigned. Each of the parties (i) has had the opportunity to be and/or

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has elected not to be, represented by counsel, (ii) has reviewed each of the provisions in this agreement carefully and (iii) has negotiated or has had full opportunity to negotiate the terms of this agreement, specifically including, but not limited to Paragraph 7 hereof. You waive any claims that may be available at law or in equity to the effect that you did not have the opportunity to so consult with counsel.

e. No Waiver. Neither the failure or delay to exercise one or more rights under this agreement nor the partial exercise of any such right, will be deemed a renunciation or waiver of such rights or any part thereof or affect, in any way, this agreement or any part hereof or the right to exercise or further exercise any right under this agreement or at law or in equity.

9. Miscellaneous Modifications. No change or waiver of the terms, covenants and provisions of this agreement will be valid unless made in writing and signed by the undersigned. Relationship. Nothing herein contained is intended to, nor shall it be construed as, reflecting any employer-employee or independent contractor relationship between you and the undersigned or any other individual or entity. Counterparts. This agreement may be executed in any number of counterparts, all of which taken together will constitute one and same instrument. Delivery of an executed signature page of this this agreement by facsimile transmission or .pdf, .jpeg, .TIFF, or other electronic format or electronic mail attachment will be effective as delivery of an original executed counterpart hereof.

10. Survival. This agreement will survive the expiration, cancellation or termination of any employment or independent contractor relationship that you may have with the Company or with any individual, entity, partnership, trust or organization that the Company has engaged.

Donald J. Trump for President


Name: LUCIA CASTELLANO
Title: HR DIRECTOR

JESSICA MARIE DENSON ACKNOWLEDGES THAT SHE HAS READ AND UNDERSTOOD THIS AGREEMENT, AND AGREES TO COMPLY WITH THE FOREGOING WHICH CREATES A VALID AND BINDING LEGAL OBLIGATION ON HER.

Jessica Marie Denson

Signature: 

Name: Jessica Marie Denson

Address: 8306 Wilshire Blvd. #310
Beverly Hills, CA 90211